



6515 S. Jackrabbit Trail, Buckeye, AZ 85326

March 30, 2017

State Emergency Response Commission (SERC)
Arizona Department of Environmental Quality
Executive Director
1110 W. Washington St
Phoenix, Arizona 85007

RE: Replacement Continuous Release Reporting Forms for Hickman's Family Farms
CR-ERNS Nos. 1173774 (Arlington North) and 1173775 (Maricopa)

Dear Sir or Madam:

On March 28, 2017, we mailed your office four written Continuous Release Reporting Forms for four facilities owned by Hickman's Family Farms which were related to telephonic notifications to the NRS made on March 21, 2017, and were assigned the following CR-ERNS Numbers: 1173773 (Arlington South); 1173774 (Arlington North); 1173775 (Maricopa); and 1173776 (Tonopah). On review of the submission we noted that two of the written Continuous Release Reporting Forms had errors in the attached pages that need to be corrected, and we do so now.

Enclosed please find two replacement Continuous Release Reporting Forms for two of the Hickman's Family Farms facilities, corresponding to CR-ERNS Nos. 1173774 (Arlington North), and 1173775 (Maricopa). Please disregard the reports for these facilities that were mailed to you on March 28, 2017, and utilize these instead. The reports that were mailed to you on March 28, 2017, regarding CR-ERNS Nos. 1173773 (Arlington South) and 1173776 (Tonopah) are not being corrected and remain in effect.

Thank you for your consideration and please contact me if you have any questions or concerns.

Sincerely,

A handwritten signature in black ink, appearing to read "R. Phalen", with a horizontal line drawn underneath it.

Robert Phalen
Hickman's Family Farms
Environmental Program Manager
rphalen@hickmanseggs.com
623-872-2341 (Office Phone)
623-300-5630 (Cell Phone)

Maricopa

Continuous Release Reporting Form

Form Approved OMB No. 2050-0086
Expiration Date: 11-30-2018

SECTION I: GENERAL INFORMATION

CR-ERNS Number: 1173775

Date of Initial Release: August, 2002

Date of Initial Call to NRC: 3/21/2017

Type of Report: Select from the drop-down list, the type of report that you are submitting

Initial Written Notification

Signed Statement: I certify that the hazardous substance releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.32 and that all submitted information is accurate and current to the best of my knowledge.

Date 3/22/2017

Name and Position Glenn Hickman, President

Signature



Part A. Facility or Vessel Information

Name of Facility or Vessel Hickman's Family Farms - Maricopa

Person in Charge of Facility or Vessel

Name Glenn Hickman

Position President

Phone Number 623-872-2308

Alt Phone No. 623-764-2182

Facility Address or Vessel Port of Registration

Street 12710 N. Murphy Road

County Pinal

City Maricopa State AZ Zip Code 85239

Dun and Bradstreet Number for Facility 035864263

Facility/Vessel Location

Latitude Deg 32 Min 59 Sec 54.3

Longitude Deg -111 Min 56 Sec 35.3832

Vessel LORAN Coordinates

N/A

NOTE: Latitude/Longitude information can be obtained at the following websites: <http://www.satsig.net/maps/lat-long-finder.htm>, <http://earth.google.com/>, and <http://www.census.gov/geo/landview/>. Do not use P.O. Box, Rural Route or Mailing Address. Use physical location only.

Part B. Population Information

Population Density

Select from the drop-down list, the range that describes the population density within a one-mile radius of your facility or vessel. 0 - 50 persons

Sensitive Populations and Ecosystems within One-Mile Radius

Sensitive Populations or Ecosystems (e.g., elementary schools, hospitals, retirement communities, or wetlands)

N/A

Estimated Distance and Direction from Facility, if Known

N/A

INSTRUCTIONS

SECTION I: GENERAL INFORMATION

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

The information required in Section I of the initial written report and follow-up reports includes general information identifying your facility, as well as information regarding the area in which your facility is located. This general information is important because it provides a better understanding of the potential risks resulting from exposure from the facility's release. A signed statement asserting that the continuous release is continuous and stable in quantity and rate, and that the information supplied is accurate and current to the best of your knowledge, is also required in Section I.

In addition, Section I must clearly identify the type of written report that you are submitting (i.e., an initial written report, a first anniversary follow-up report, or a written report of the change in source or composition of a previously reported release). You must also include information on the initial notification of the release, such as the date of the release and the date of the initial call. For CERCLA hazardous substances, the CR-ERNS number assigned to you by the NRC will also be required.

Type of Report - Select from drop-down list.

Initial Written Notification - Within 30 days of the initial telephone notification, you are required to submit an initial written report to the appropriate EPA Regional Office, SERC, and LEPC (for releases of CERCLA hazardous substances) and to only the appropriate SERC and LEPC (for releases of non-CERCLA EHSs). The purpose of this report is to confirm your intent to report your release as a continuous release under Section 103(f)(2), and to provide government response officials with sufficient information about your release to enable them to determine if the release qualifies as a continuous release.

First Anniversary Follow-up Report - For reports of releases of CERCLA hazardous substances, within 30 days of the first anniversary of your initial written report, you are required to reassess your initial continuous release report and gather the information on all of the reported substances being released. After doing this, you must submit a one-time written first anniversary follow-up report to the appropriate EPA Regional Office. Please note that the first anniversary report must be sent to the appropriate EPA Regional Office for all reports of CERCLA hazardous substances, but is not required for reports of non-CERCLA EHSs.

Written Notification of a Change to Initial Notification and/or Written Notification of a Change to Follow-up Report -

[NOTE: For these reports, select the report type that reflects the notification or report for which you are reporting a change.]

- = Notification of a change in source or composition, which is treated as if it were a new release (i.e., with a telephone call to the NRC, SERC, and LEPC, followed by a written report and a first anniversary follow-up report);
- = Notification of a change in the normal range, if there is a change in the release such that the quantity of the release exceeds the upper bound of the reported normal range, the release must be reported as a statistically significant increase;
- = For CERCLA substances only, notification of any other reported information (e.g., a change in facility ownership) in a written letter to only the EPA Region.

Part A. Facility or Vessel Information -

1. The complete name of your facility (and company identifier where appropriate). If multiple facilities are included in your written report, provide the plant site name with the name of the facility.
2. The full address of your facility, including the street address or highway marker, city, county, state, and zip code. A post office box number should not be used as the facility address. The address provided should be the location of the facility where the hazardous substance release occurs.
3. The location of your facility by its latitude and longitude in units of degrees, minutes, and seconds. See below for helpful hints on how to obtain the latitude and longitude coordinates of your facility.
4. The nine digit number assigned by Dun and Bradstreet (D&B) to your facility. This number can be obtained via telephone by an officer of your company from the national office of Dun and Bradstreet (at 1-800-234-3867). If your facility has not been assigned a D&B number, please specify that the information is not applicable. http://www.dnb.com/US/duns_update
5. For reports of CERCLA hazardous substances, the CR-ERNS number assigned by the NRC when you made the initial telephone report. Be certain to include the CR-ERNS number on each page of your report.
6. The name, telephone number (including area code), and an alternate telephone number for the person in charge of your facility.

SOURCES OF INFORMATION FOR IDENTIFYING THE LOCATION OF YOUR FACILITY

Sources of data on latitude and longitude coordinates of your facility include EPA permits (e.g., NPDES permits), county property records, facility blueprints, and site plans. In addition, information on the latitude and longitude of your facility may be obtained from a United States Geological Survey (USGS) topographical map. These maps are available in both the 7.5 minute and 15 minute series. These maps may be obtained from the USGS distribution center at your local public library. If you would like to order a map from USGS, contact: U.S. Geological Survey - Information Services, Box 25286, Denver, CO 80225, call 1-888-ASK-USGS (1-888-275-8747)/<http://library.usgs.gov/maplinks.html>

If you are not certain on which map your site is located, consult the index of topographic maps for your state, which may be obtained from USGS free of charge. USGS maps are also available at commercial dealers such as surveyors or outdoor recreation equipment dealers.

Latitude/longitude information can be obtained at the following websites: <http://www.srsig.net/maps/lat-long-flnder.htm>, <http://earth.google.com/>, and <http://www.census.gov/geo/landview/>.

Part B. Population Information -

1. Choose the range from the drop down list, the range that most accurately describes the population density within a one-mile radius of your facility.
2. Identify and describe the location of any sensitive populations or ecosystems within a one-mile radius of your facility. If possible, describe the location of the populations or ecosystems in terms of distance and direction from your facility (e.g., located ¼ mile northwest of the facility). Exact addresses are not required.

Sensitive populations - populations likely to be more susceptible than average individuals to the effects of exposure to a hazardous substance. Examples of sensitive populations are elementary school children, retirement communities, or hospitals.

Sensitive ecosystems - environments likely to be more susceptible than average environments to the effects of exposure to a hazardous substance, or ecosystems that have been designated for special protection by Federal or state governments. Example of sensitive ecosystems includes wetlands.

Continuous Release Reporting Form

Form Approved OMB No. 2050-0086
Expiration Date: 11-30-2018

SECTION II: SOURCE INFORMATION

CR-ERNS Number: 1173775

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet.

Name of Source:

Maricopa Barn Numbers 1-7
M1 = 08/02, M2 = 11/02, M3 = 03/03, M4 = 07/03, M5 = 11/03, M6 = 01/14, M7 = 03/14

1. Indicate whether the release from this source is either:

☒ Continuous without interruption

OR

☐ routine, anticipated, intermittent & incidental to

Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

2. Provide a brief statement describing the basis for stating that the release is continuous and stable in quantity and rate. If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate given the note above.

Manure is continuously removed from the lay house via the conveyor belt and deposited in compost rows within the manure drying area of the house.

The manure is dried via fans that reduce the moisture, thereby reducing ammonia emissions. Each manure drying area is completely cleaned out at a minimum of every 7 days and a maximum of every 14 days.

The manure is removed from each house 5-6 days per week. Each house is completely emptied every 14 days.

3. Identify below how you established the pattern or release and calculated release estimates.

☐ Release data ☒ Knowledge of Operating Procedures ☐ Engineering estimate ☒ Best Professional judgment

Other -

INSTRUCTIONS

SECTION II: SOURCE INFORMATION

(Part A)

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

General overview - When completing your written reports, you must take into consideration all sources of the release from your facility.

Providing this information accurately in the initial written and first anniversary follow-up report will minimize future requests by EPA for additional information or clarification.

In this section of the written report, you should identify and describe separately each continuous release source. If the continuous release of the same hazardous substance comes from two or more sources (e.g., two stacks), then information should be reported separately for each of the sources. For example, if a stack is one of several sources of a hazardous substance release at your facility, you must provide information on that stack including: the stack height; the identity of the hazardous substance(s) being released from the stack; the quantity released; and the frequency of the release from the stack. If you have a release of a particular hazardous substance from three stacks, you should report each stack separately and provide the required information specified for each stack.

Although the continuous release reporting regulation allows multiple concurrent releases of the same CERCLA hazardous substance to be considered as if they were one continuous release, aggregate reporting of such releases from different sources complicates risk analyses. Area sources are most readily aggregated for purposes of continuous release reporting and risk evaluation when the frequency of the release from each source is the same. Similarly, aggregated stack releases are most readily evaluated if the frequency of the release from each stack is the same and the stack configurations (e.g., stack height, diameter, throughput) are the same. If you elect to aggregate releases across facilities, be certain to identify information about each source of the release from all of your facilities. Also, note that if you aggregate your releases, EPA may request clarifying information about the releases from each of the individual sources.

Identification of sources - In Section II, you must identify (i.e., name) and describe each continuous release source. There are several ways to name release sources. It is important to: (1) provide a name that clearly identifies the source (e.g., centrifugal processor A, rather than Unit A); and (2) avoid giving two or more sources the same name. It is also important to remember when naming your sources that EPA, at any time, may contact you with questions regarding releases from one of your named sources. It would be prudent, therefore, to name the sources at your facility in a manner that will be easy for you and other employees to identify them. For example, if your plant has four stacks, two wastepiles, and twenty-four valves, you may name the sources as follows: Stack #1; Stack #2; Stack #3; Stack #4; Wastepile #1; Wastepile #2; and Valves in Building #2. Note that the "Valves in Building #2" are aggregated in this example and reported as a single source.

Required information - Section II, Source Information, contains three Parts (A, B, and C). You must provide the information required in each of these Parts for each continuous release source. Be sure to place the name of the source on all pages associated with that specific source. There is one exception to this rule. If the release from any individual source will affect more than one environmental medium (e.g., a wastepile releasing to air and ground water) it must be modeled separately. Therefore, any source that affects two different media should be treated as two separate sources for purposes of reporting. This is desirable because EPA must analyze each release pathway separately to properly evaluate the risks posed by the continuous release. In addition, because the hazardous substance releases to each medium may differ in frequency and quantity, it is useful to distinguish the releases for purposes of risk evaluation.

Part A - Basis for Asserting the Release is Continuous and Stable in Quantity and Rate:

You must first identify the source of the release (include the name of the source in all subsequent parts), then briefly describe the basis for stating that the release is continuous and stable in quantity and rate. Your description of the basis for stating that the hazardous substance release is continuous and stable in quantity and rate should include whether the release is continuous without interruption, or is a routine, anticipated, intermittent release. It should also include information on when the release is expected to occur (i.e., evidence of predictability of the release). One example of a release that may be predictable and regular is fugitive emissions from valves that occur at different rates over the course of a production cycle as the pressure inside the system changes. Although the rate of such fugitive emissions may not be strictly uniform, it may be predictable in the sense that the rate and amount of the release vary in a similar manner each time the process is operated or decompression occurs.

Your description should also identify the activity that results in the release (e.g., batch process, operating procedure, loading/unloading, maintenance activity, filling of storage tanks). If the release occurs because of a malfunction, this should be explained fully. Note that only certain releases due to malfunctions can qualify as a continuous release. Please refer to the discussion in the preamble of the continuous release final rule at 55 FR 30171, Jul. 24, 1990.

Finally, your description should include information on how you established the pattern of the release and calculated release estimates (e.g., engineering estimates, your best professional judgment, past release data).

For each source identified, provide the following information:

- (1) Indicate whether the release is continuous without interruption or abatement or routine, anticipated, and intermittent.
- (2) Identify the activity or activities that cause the release from the source.
- (3) If the release results from a malfunction, describe the malfunction and explain why the release should be considered continuous and stable in quantity and rate.
- (4) Identify how you established the pattern of the release and calculated release estimates.

Continuous Release Reporting Form

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SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 1173775

Name of Source:

Maricopa Barn Numbers 1-7
M1 = 08/02, M2 = 11/02, M3 = 03/03, M4 = 07/03, M5 = 11/03, M6 = 01/14, M7 = 03/14

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II, Parts A, B, and C, of this format for EACH medium affected.

☒ **AIR** If the medium affected is air, please also specify whether the source is a **stack** or a **ground-based area source**.

☐ **Stack** Indicate stack height in feet or meters

☐ **Ground Based**

☐ **SURFACE WATER**

If the release affects any **surface water body**, give the name of the water body.

☐ **Surface Water Body**

N/A

☐ **Stream**

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.

Stream Order

N/A

OR

Average Flow Rate (cubic feet/second)

N/A

☐ **Lake**

Surface area of lake (in acres)

N/A

Average depth of lake (in meters)

N/A

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.

☐ **SOIL OR GROUND WATER**

If the release is on or under **ground**, the location of public water supply wells within two miles.

N/A All manure is contained in the manure drying area within the lay house.

Optional Information

The following information is not required to comply with the regulation; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter (feet or meters)

N/A

Gas Exit Velocity (ft or meters/sec)

N/A

Gas Temp (degrees Fahrenheit, Kelvin, or Celsius)

N/A

For a release to surface water, provide the following information, if available:

Average velocity of surface water (feet/second)

N/A

INSTRUCTIONS

SECTION II: SOURCE INFORMATION

(Part B)

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

Part B - Specific Information on the Source:

You must identify the environmental medium (i.e., air, surface water, soil, or ground water) affected by the hazardous substance release from each source identified in Section II, Part A. In addition, you must provide specific information on the source and its affected environment. It is important to remember that if you have a release from a single source that affects two different media (e.g., gypsum stack releasing radon to air and radionuclides to ground water), you should treat the release to each medium as a separate source for purposes of reporting. Another important point to remember when completing all sections of the written report is to include the appropriate units, such as kilograms, meters, or curies.

Environmental medium - Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from the identified source.

1. **Air** - If the medium affected is air, provide the following information:
 - a. Indicate whether the source is a stack or ground-based area source.
 - b. If the source is a stack, provide the stack height in feet or meters. The stack height is the distance from the ground to the top of the stack.
 - c. If the source is an area source (e.g., a waste pile, surface impoundment, landfill, valve, pump seal, or storage tank vent), provide an estimate of the surface area or area of the release source including the appropriate unit such as square feet, square meters, or acres.
2. **Surface Water** - If the medium affected is surface water, provide the following information:
 - a. If the release affects any surface water body, give the name of the water body.
 - b. If the release affects a stream, give the "stream order" or the average flow rate (in cubic feet per second). This information can be obtained from your state water resource division of USGS. If you cannot locate this information, use the chart below to estimate the flow rate according to the velocity of the stream. If the velocity of the stream fluctuates during the year, use the average velocity when calculating average flow rate.
 - c. If the release affects a lake, or other large surface water body (e.g., a bay) give the surface area of the lake (in acres) and the average depth (in feet or meters). Below are sources of information for estimating the average lake depth.
3. **Soil or Ground Water** - If the medium affected is soil or ground water, provide the following information:
 - a. If the release is on or under ground, indicate the distance to the closest public water supply well within a two-mile radius of the site. Information regarding the location of public water supply wells may be available through the county office that issues permits for wells.

Estimated Average Stream Flow Rates

Stream Order	Mean Flow (CFS)	Mean Velocity (ft/sec)
1	0.65	1.0
2	3.10	1.3
3	15.00	1.5
4	71.00	1.8
5	340.00	2.3
6	1,600.00	2.7
7	7,600.00	3.3
8	56,000.00	3.9
9	171,000.00	5.6
10	810,000.00	5.9

Sources of Information for Estimating Average Lake Depth

If the lake is large enough to be navigable, your local Coast Guard office will have a navigation chart that will provide the average depth of the lake. For smaller lakes, you may estimate the average depth of the lake by relying on your knowledge of the use of the lake and the surrounding area, and your best professional judgment.

Optional information - The following information is not required to comply with the regulation; however, such information will assist EPA in evaluating the risks associated with a continuous release. If the information below is not provided, conservative values will be used to evaluate the risks associated with the continuous release.

1. If the source is a stack release to air, provide the: (a) inside diameter of the stack, (b) gas exit velocity; and (c) gas temperature.
2. If the release affects surface water, provide the average velocity of the surface water.

Continuous Release Reporting Form

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SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 1173775

Part C: Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source.

Name of Source:

Maricopa Barn Numbers 1-7
M1 = 08/02, M2 = 11/02, M3 = 03/03, M4 = 07/03, M5 = 11/03, M6 = 01/14, M7 = 03/14

List each hazardous substance released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Hazardous Substance	CASRN #	Normal Range (in lbs., kg, or Ci per day)		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs., kg, or Ci)	Period of the Release
		Upper Bound	Lower Bound			
Ammonia	7664-41-7	896 lbs / day	0 lbs / day	365	Unknown	All 12 Months

List each mixture released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Mixture	Name of Hazardous Substance Components	CASRN #	Weight Percentage	Normal Range of Components (in lbs., kg, or Ci per day)		OR	Normal Range of Mixture (in lbs., kg, or Ci per day)		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs., kg or Ci)	Period of the Release
				Upper Bound	Lower Bound		Upper Bound	Lower Bound			
N/A											

EXAMPLES OF REPORTING SINGLE HAZARDOUS SUBSTANCES

In this example, your facility has a release which may qualify for reduced reporting as a continuous release. The hazardous substances released from the identified source (Stack A) are hydrogen chloride (7647010) and hydrogen flouride (7664393).

The volume of hydrogen chloride (HCl) released in 24-hour period is between 0 and 9,950 lbs. During the previoius year, 11,500 lbs of HCl was released. The release occurs once per week in February and June for a total of 8 days per year. The amount of hydrogen flouride (HF1) released is between 1 and 6,000 lbs. The release of HF1 occurs approximately 120 days each year. A total amount released last year was 13,800 lbs.

For these releases from the specific source, you must provide the information outlined below.

<u>Name of Hazardous Substance</u>	<u>CASRN #</u>	<u>Normal Range</u> (in lbs., kg or Ci per day)		<u>Number of Days</u> <u>Release Occurs</u> (per year)	<u>Total Quantity</u> <u>Released in Previous Year</u> (in lbs., kg or Ci)	<u>Period of the</u> <u>Release</u>
		<u>Upper Bound</u>	<u>Lower Bound</u>			
Hydrogen Chloride (HCl)	7647010	9,950 lbs	0 lbs	8	11,500 lbs.	February; June
Hydrogen Flouride (HF1)	7664393	6,000 lbs	1 lb	120	13,800	All 12 months

EXAMPLE OF REPORTING A MIXTURE

In this example, if your facility wants to report the release of a mixture of hazardous substances, you must list each component of the mixture by hazardous substance and include its percentage by weight. For example, for the release of mixture Z, you must provide the following information about its components, ethylene oxide, acrolein, and 2,3,5-tri-chlorophenol:

<u>Name of Mixture</u>	<u>Name of Hazardous Substance Components</u>	<u>CASRN #</u>	<u>Weight Percentage</u>	<u>Normal Range of Components</u> (in lbs., kg or Ci per day)		<u>OR</u>	<u>Normal Range of Mixture</u> (in lbs., kg or Ci per day)		<u>Number of Days Release Occurs (per year)</u>	<u>Total Quantity of Mixture Released in Previous Year (in lbs., kg or Ci)</u>	<u>Period of the Release</u>
				<u>Upper Bound</u>	<u>Lower Bound</u>	<u>Upper Bound</u>	<u>Lower Bound</u>				
Z	(components listed below)						100 lbs	0 lbs	365	79,500 lbs	All 12 Months
Z	Ethylene oxide	75218	10%	10 lbs	0 lbs						
Z	Acrolein	107028	15%	15 lbs	0 lbs						
Z	2,3,5-tri-chlorophenol	933788	20%	20 lbs	0 lbs						

INSTRUCTIONS

SECTION II: SOURCE INFORMATION

(Part C)

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

Part C - Identity and Quantity of Each Hazardous Substance or Mixture Released:

For each source, you must report information about the identity and quantity of the hazardous substances released from the source. In particular, you must identify the normal range of each release and the total annual quantity released during the previous year from each source.

You are not necessarily required to monitor releases to determine the normal range of the release. You may establish the normal range by using engineering estimates of releases under various operating conditions, knowledge of the operating history of the facility, experience with operating processes, professional judgment, or any other method that has a sound technical basis. EPA will use the upper bound of the normal range to estimate the risks to human health and the environment posed by the hazardous substance release.

To provide the required information regarding the quantity of the hazardous substance released from each identified source, you should begin by determining whether the release is a single hazardous substance or a mixture of hazardous substances.

Normal Range

The normal range of a continuous release includes all releases of a hazardous substance (in pounds, kilograms, or curies) reported or occurring during any 24-hour period under normal operating conditions during the previous year. Only releases that are both continuous and stable in quantity and rate may be included in the normal range.

Reporting Single Hazardous Substances - For each source, follow the directions below to report each hazardous substance released from the source that is a single hazardous substance or a component of a mixture that you wish to report separately.

1. Identify the hazardous substance released by name and by Chemical Abstracts Service Registry Number (CASRN). The CASRN for a hazardous substance can be located in any material safety data sheet or in most chemical supplier company catalogues.
2. Provide the upper and lower bounds of the normal range of the release from the identified source (i.e., quantity in pounds, kilograms, or curies) during the previous year.
3. Estimate the total annual amount (in pounds, kilograms, or curies) of the hazardous substance released from the identified source during the previous year.
4. Specify the frequency of the release by indicating the number of days the release occurs per year from the identified source. Stating "continuous" is not sufficient, as one source may be continuously operating 365 days a year, while another source may be continuously operating on weekdays, 261 days a year.
5. Indicate the actual months the release occurs.

Reporting a Mixture - For each source, follow the directions below to report each mixture released from the source.

1. Identify the mixture by name (e.g., Blue Pigment #25).
2. Identify each hazardous substance component of the mixture by name and CASRN.
3. Estimate the percentage by weight of each hazardous substance component of the mixture.
4. Provide the upper and lower bounds (i.e., quantity in pounds, kilograms, or curies) of the normal range of each hazardous substance component of the mixture that was released from this source. To calculate the upper bound of the normal range of each hazardous substance component, multiply the weight percentage of each component by the upper bound quantity of the mixture.
5. Provide the upper and lower bounds (i.e., quantity in pounds, kilograms, or curies) of the normal range of the mixture that was released from the identified source during the previous year.
6. Specify the frequency of the release by indicating the number of days the release occurs per year from the identified source. Stating "continuous" is not sufficient, as one source may be continuously operating 365 days a year, while another source may be continuously operating on weekdays, 261 days a year.
7. Estimate the total annual quantity (in pounds, kilograms, or curies) of the mixture that was released from the identified source during the previous year.
8. Indicate the actual months the release occurs.

Continuous Release Reporting Form

Form Approved OMB No. 2050-0086
Expiration Date: 11-30-2018

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 1173775

Calculation of the SSI Trigger

For EACH hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance.

Name of Hazardous Substance: Ammonia

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., kg., or Ci)
Maricopa Barn #s 1-7	896 lbs.

TOTAL - SSI trigger for this hazardous substance release*: 896 lbs.

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

INSTRUCTIONS

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

After you provide the required information for all sources of continuous releases from your facility, you must aggregate information of a hazardous substance release from all sources to determine the SSI trigger (upper bound of the normal range) for each hazardous substance released at your facility.

The SSI trigger of a particular hazardous substance is calculated by aggregating the upper bounds of the hazardous substance released across all sources at a facility.

If you are aggregating CERCLA hazardous substance releases from separate, contiguous, or adjacent facilities and reporting them in a single report, aggregate the upper bound of the normal range of the hazardous substance released from all sources at the site to determine the SSI trigger. If you aggregate your releases across facilities, the SSI trigger must also be site-specific, not facility-specific. Aggregating releases across facilities at the same site may reduce your reporting burden; however, EPA will evaluate the risks associated with the releases as if the releases were from one facility.

To calculate the SSI trigger for each hazardous substance you should:

1. List each specific source name and enter the upper bound of the normal range of the release from that source. If the identified hazardous substance is a component of a mixture, enter the upper bound of the normal range for that component of the mixture (as determined in Section II, Part C).
2. Aggregate the upper bound quantities from each source of the release. Report these totals as the SSI trigger for the hazardous substance. The example that is provided below illustrates the calculation of the SSI trigger for a release of ammonia.

The above method for calculating the SSI trigger of a hazardous substance assumes that all releases of the same hazardous substance occur simultaneously (i.e., over the same 24-hour period). To the extent that the frequency of the release differs, you may adjust the SSI trigger so that it more accurately reflects the frequency and quantity of the hazardous substance released from all sources over a 24-hour period. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility. The normal range of the release includes all continuous releases previously reported or occurring over a 24-hour period during the previous year.

Calculation of the SSI Trigger for a Hazardous Substance

Hazardous Substance	Source	Upper Bound
Ammonia	Tank Vents in Building #1	120 lbs.
	Valves in Building #5	115 lbs.
	Upper Bound for Ammonia	235 lbs.

For the purposes of this example, it is assumed that the only sources of the ammonia release at the facility are the Tank Vents in Building #1 and the Valves in Building #5.

Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection of information is estimated to average 10 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. Do not send the completed form to this address.

Arlington North

Continuous Release Reporting Form

Form Approved OMB No. 2050-0086
Expiration Date: 11-30-2018

SECTION I: GENERAL INFORMATION

CR-ERNS Number: 1173774

Date of Initial Release: July, 2008

Date of Initial Call to NRC: 3/21/2017

Type of Report: Select from the drop-down list, the type of report that you are submitting

Initial Written Notification

Signed Statement: I certify that the hazardous substance releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.32 and that all submitted information is accurate and current to the best of my knowledge.

Date 3/22/2017

Name and Position Glenn Hickman, President

Signature



Part A. Facility or Vessel Information

Name of Facility or Vessel Hickman's Family Farms - Arlington North

Person in Charge of Facility or Vessel

Name

Glenn Hickman

Position

President

Phone Number

623-872-2308

Alt Phone No.

623-764-2182

Facility Address or Vessel Port of Registration

Street

32902 W. Ward Road

County

Maricopa

City

Arlington

State

AZ

Zip Code

85322

Dun and Bradstreet Number for Facility

035864263

Facility/Vessel Location

Latitude

Deg

33

Min

21

Sec

56.8872

Longitude

Deg

-112

Min

45

Sec

10.4754

Vessel LORAN Coordinates

N/A

NOTE: Latitude/Longitude information can be obtained at the following websites: <http://www.satsig.net/maps/lat-long-finder.htm>, <http://earth.google.com/>, and <http://www.census.gov/geo/landview/>. Do not use P.O. Box, Rural Route or Mailing Address. Use physical location only.

Part B. Population Information

Population Density

Select from the drop-down list, the range that describes the population density within a one-mile radius of your facility or vessel.

0 - 50 persons

Sensitive Populations and Ecosystems within One-Mile Radius

Sensitive Populations or Ecosystems (e.g., elementary schools, hospitals, retirement communities, or wetlands)

N/A

Estimated Distance and Direction from Facility, if Known

N/A

INSTRUCTIONS

SECTION I: GENERAL INFORMATION

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

The information required in Section I of the initial written report and follow-up reports includes general information identifying your facility, as well as information regarding the area in which your facility is located. This general information is important because it provides a better understanding of the potential risks resulting from exposure from the facility's release. A signed statement asserting that the continuous release is continuous and stable in quantity and rate, and that the information supplied is accurate and current to the best of your knowledge, is also required in Section I.

In addition, Section I must clearly identify the type of written report that you are submitting (i.e., an initial written report, a first anniversary follow-up report, or a written report of the change in source or composition of a previously reported release). You must also include information on the initial notification of the release, such as the date of the release and the date of the initial call. For CERCLA hazardous substances, the CR-ERNS number assigned to you by the NRC will also be required.

Type of Report - Select from drop-down list.

Initial Written Notification - Within 30 days of the initial telephone notification, you are required to submit an initial written report to the appropriate EPA Regional Office, SERC, and LEPC (for releases of CERCLA hazardous substances) and to only the appropriate SERC and LEPC (for releases of non-CERCLA EHSs). The purpose of this report is to confirm your intent to report your release as a continuous release under Section 103(f)(2), and to provide government response officials with sufficient information about your release to enable them to determine if the release qualifies as a continuous release.

First Anniversary Follow-up Report - For reports of releases of CERCLA hazardous substances, within 30 days of the first anniversary of your initial written report, you are required to reassess your initial continuous release report and gather the information on all of the reported substances being released. After doing this, you must submit a one-time written first anniversary follow-up report to the appropriate EPA Regional Office. Please note that the first anniversary report must be sent to the appropriate EPA Regional Office for all reports of CERCLA hazardous substances, but is not required for reports of non-CERCLA EHSs.

Written Notification of a Change to Initial Notification and/or Written Notification of a Change to Follow-up Report -

[NOTE: For these reports, select the report type that reflects the notification or report for which you are reporting a change.]

- = Notification of a change in source or composition, which is treated as if it were a new release (i.e., with a telephone call to the NRC, SERC, and LEPC, followed by a written report and a first anniversary follow-up report);
- = Notification of a change in the normal range, if there is a change in the release such that the quantity of the release exceeds the upper bound of the reported normal range, the release must be reported as a statistically significant increase;
- = For CERCLA substances only, notification of any other reported information (e.g., a change in facility ownership) in a written letter to only the EPA Region.

Part A. Facility or Vessel Information -

1. The complete name of your facility (and company identifier where appropriate). If multiple facilities are included in your written report, provide the plant site name with the name of the facility.
2. The full address of your facility, including the street address or highway marker, city, county, state, and zip code. A post office box number should not be used as the facility address. The address provided should be the location of the facility where the hazardous substance release occurs.
3. The location of your facility by its latitude and longitude in units of degrees, minutes, and seconds. See below for helpful hints on how to obtain the latitude and longitude coordinates of your facility.
4. The nine digit number assigned by Dun and Bradstreet (D&B) to your facility. This number can be obtained via telephone by an officer of your company from the national office of Dun and Bradstreet (at 1-800-234-3867). If your facility has not been assigned a D&B number, please specify that the information is not applicable. http://www.dnb.com/USduns_update/
5. For reports of CERCLA hazardous substances, the CR-ERNS number assigned by the NRC when you made the initial telephone report. Be certain to include the CR-ERNS number on each page of your report.
6. The name, telephone number (including area code), and an alternate telephone number for the person in charge of your facility.

SOURCES OF INFORMATION FOR IDENTIFYING THE LOCATION OF YOUR FACILITY

Sources of data on latitude and longitude coordinates of your facility include EPA permits (e.g., NPDES permits), county property records, facility blueprints, and site plans. In addition, information on the latitude and longitude of your facility may be obtained from a United States Geological Survey (USGS) topographical map. These maps are available in both the 7.5 minute and 15 minute series. These maps may be obtained from the USGS distribution center at your local public library. If you would like to order a map from USGS, contact: U.S. Geological Survey - Information Services, Box 25286, Denver, CO 80225, call 1-888-ASK-USGS (1-888-275-8747)/<http://library.usgs.gov/maplinks.html>

If you are not certain on which map your site is located, consult the index of topographic maps for your state, which may be obtained from USGS free of charge. USGS maps are also available at commercial dealers such as surveyors or outdoor recreation equipment dealers.

Latitude/Longitude information can be obtained at the following websites: <http://www.satsig.net/maps/lat-long-finder.htm>, <http://earth.google.com/>, and <http://www.census.gov/geol/uniview/>.

Part B. Population Information -

1. Choose the range from the drop down list, the range that most accurately describes the population density within a one-mile radius of your facility.
2. Identify and describe the location of any sensitive populations or ecosystems within a one-mile radius of your facility. If possible, describe the location of the populations or ecosystems in terms of distance and direction from your facility (e.g., located 1/4 mile northwest of the facility). Exact addresses are not required.

Sensitive populations - populations likely to be more susceptible than average individuals to the effects of exposure to a hazardous substance. Examples of sensitive populations are elementary school children, retirement communities, or hospitals.

Sensitive ecosystems - environments likely to be more susceptible than average environments to the effects of exposure to a hazardous substance, or ecosystems that have been designated for special protection by Federal or state governments. Example of sensitive ecosystems includes wetlands.

Continuous Release Reporting Form

Form Approved OMB No. 2050-0086
Expiration Date: 11-30-2018

SECTION II: SOURCE INFORMATION

CR-ERNS Number: 1173774

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet.

Name of Source:

Arlington North Barn Numbers 13-26 & 3 Pullet Houses = H, I, & J.
AN13 = 07/08, AN14 = 09/08, AN15 = 11/08, AN16 = 01/09, AN17 = 03/09, AN18 = 05/09, AN19 = 07/09,
AN20 = 09/09, AN21 = 06/09, AN22 = 08/10, AN23 = 10/10, AN24 = 12/10, AN25 = 08/11, AN26 = 10/11,
ANPH = 05/14, ANPJ = 07/14, ANPJ = 08/15

1. Indicate whether the release from this source is either:



Continuous without interruption

OR



routine, anticipated, intermittent & incidental to

Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

2. Provide a brief statement describing the basis for stating that the release is continuous and stable in quantity and rate. If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate given the note above.

Manure is continuously removed from the lay house via the conveyor belt and deposited in compost rows within the manure drying area of the house.

The manure is dried via fans that reduce the moisture, thereby reducing ammonia emissions.
Each manure drying area is completely cleaned out at a minimum of every 7 days and a maximum of every 14 days.

The manure is removed from each house 5-6 days per week.
Each house is completely emptied every 14 days.

3. Identify below how you established the pattern or release and calculated release estimates.



Release data



Knowledge of Operating Procedures



Engineering estimate



Best Professional judgment

Other -

INSTRUCTIONS

SECTION II: SOURCE INFORMATION

(Part A)

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

General overview - When completing your written reports, you must take into consideration all sources of the release from your facility.

Providing this information accurately in the initial written and first anniversary follow-up report will minimize future requests by EPA for additional information or clarification.

In this section of the written report, you should identify and describe separately each continuous release source. If the continuous release of the same hazardous substance comes from two or more sources (e.g., two stacks), then information should be reported separately for each of the sources. For example, if a stack is one of several sources of a hazardous substance release at your facility, you must provide information on that stack including: the stack height; the identity of the hazardous substance(s) being released from the stack; the quantity released; and the frequency of the release from the stack. If you have a release of a particular hazardous substance from three stacks, you should report each stack separately and provide the required information specified for each stack.

Although the continuous release reporting regulation allows multiple concurrent releases of the same CERCLA hazardous substance to be considered as if they were one continuous release, aggregate reporting of such releases from different sources complicates risk analyses. Area sources are most readily aggregated for purposes of continuous release reporting and risk evaluation when the frequency of the release from each source is the same. Similarly, aggregated stack releases are most readily evaluated if the frequency of the release from each stack is the same and the stack configurations (e.g., stack height, diameter, throughput) are the same. If you elect to aggregate releases across facilities, be certain to identify information about each source of the release from all of your facilities. Also, note that if you aggregate your releases, EPA may request clarifying information about the releases from each of the individual sources.

Identification of sources - In Section II, you must identify (i.e., name) and describe each continuous release source. There are several ways to name release sources. It is important to: (1) provide a name that clearly identifies the source (e.g., centrifugal processor A, rather than Unit A); and (2) avoid giving two or more sources the same name. It is also important to remember when naming your sources that EPA, at any time, may contact you with questions regarding releases from one of your named sources. It would be prudent, therefore, to name the sources at your facility in a manner that will be easy for you and other employees to identify them. For example, if your plant has four stacks, two wastepiles, and twenty-four valves, you may name the sources as follows: Stack #1; Stack #2; Stack #3; Stack #4; Wastepile #1; Wastepile #2; and Valves in Building #2. Note that the "Valves in Building #2" are aggregated in this example and reported as a single source.

Required information - Section II, Source Information, contains three Parts (A, B, and C). You must provide the information required in each of these Parts for each continuous release source. Be sure to place the name of the source on all pages associated with that specific source. There is one exception to this rule. If the release from any individual source will affect more than one environmental medium (e.g., a wastepile releasing to air and ground water) it must be modeled separately. Therefore, any source that affects two different media should be treated as two separate sources for purposes of reporting. This is desirable because EPA must analyze each release pathway separately to properly evaluate the risks posed by the continuous release. In addition, because the hazardous substance releases to each medium may differ in frequency and quantity, it is useful to distinguish the releases for purposes of risk evaluation.

Part A - Basis for Asserting the Release is Continuous and Stable in Quantity and Rate:

You must first identify the source of the release (include the name of the source in all subsequent parts), then briefly describe the basis for stating that the release is continuous and stable in quantity and rate. Your description of the basis for stating that the hazardous substance release is continuous and stable in quantity and rate should include whether the release is continuous without interruption, or is a routine, anticipated, intermittent release. It should also include information on when the release is expected to occur (i.e., evidence of predictability of the release). One example of a release that may be predictable and regular is fugitive emissions from valves that occur at different rates over the course of a production cycle as the pressure inside the system changes. Although the rate of such fugitive emissions may not be strictly uniform, it may be predictable in the sense that the rate and amount of the release vary in a similar manner each time the process is operated or decompression occurs.

Your description should also identify the activity that results in the release (e.g., batch process, operating procedure, loading/unloading, maintenance activity, filling of storage tanks). If the release occurs because of a malfunction, this should be explained fully. Note that only certain releases due to malfunctions can qualify as a continuous release. Please refer to the discussion in the preamble of the continuous release final rule at 55 FR 30171, Jul 24, 1990.

Finally, your description should include information on how you established the pattern of the release and calculated release estimates (e.g., engineering estimates, your best professional judgment, past release data).

For each source identified, provide the following information:

- (1) Indicate whether the release is continuous without interruption or abatement or routine, anticipated, and intermittent.
- (2) Identify the activity or activities that cause the release from the source.
- (3) If the release results from a malfunction, describe the malfunction and explain why the release should be considered continuous and stable in quantity and rate.
- (4) Identify how you established the pattern of the release and calculated release estimates.

Continuous Release Reporting Form

Form Approved OMB No. 2050-0086
Expiration Date: 11-30-2018

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 1173774

Name of Source:

Arlington North Barn Numbers 13-26 & 3 Pullet Houses = H, I, & J. AN13 = 07/08,
AN14 = 09/08, AN15 = 11/08, AN16 = 01/09, AN17 = 03/09, AN18 = 05/09, AN19 = 07/09,
AN20 = 09/09, AN21 = 06/09, AN22 = 08/10, AN23 = 10/10, AN24 = 12/10, AN25 = 08/11,
AN26 = 10/11, ANPH = 05/14, ANPI = 07/14, ANPJ = 08/15

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II, Parts A, B, and C, of this format for EACH medium affected.

☒ **AIR** If the medium affected is air, please also specify whether the source is a stack or a ground-based area source.

☐ **Stack** Indicate stack height in feet or meters

Ground Based

☐ **SURFACE WATER**

If the release affects any surface water body, give the name of the water body.

☐ **Surface
Water Body**

N/A

☐ **Stream**

If the release affects a stream, give the stream order or average flow rate, in cubic feet per second.

Stream Order

N/A

OR

Average Flow Rate (cubic feet/second)

N/A

☐ **Lake**

Surface area of lake (in acres)

N/A

Average depth of lake (in meters)

N/A

If the release affects a lake, give the surface area of the lake in acres and the average depth in meters.

☐ **SOIL OR GROUND WATER**

If the release is on or under ground, the location of public water supply wells within two miles.

N/A All manure is contained in the manure drying area within the lay house.

Optional Information

The following information is not required to comply with the regulation; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter (feet or meters)

N/A

Gas Exit Velocity (ft or meters/sec)

N/A

Gas Temp (degrees Fahrenheit, Kelvin, or Celsius)

N/A

For a release to surface water, provide the following information, if available:

Average velocity of surface water (feet/second)

N/A

INSTRUCTIONS

SECTION II: SOURCE INFORMATION

(Part B)

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

Part B - Specific Information on the Source:

You must identify the environmental medium (i.e., air, surface water, soil, or ground water) affected by the hazardous substance release from each source identified in Section II, Part A. In addition, you must provide specific information on the source and its affected environment. It is important to remember that if you have a release from a single source that affects two different media (e.g., gypsum slack releasing radon to air and radionuclides to ground water), you should treat the release to each medium as a separate source for purposes of reporting. Another important point to remember when completing all sections of the written report is to include the appropriate units, such as kilograms, meters, or curies.

Environmental medium - Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from the identified source.

1. **Air** - If the medium affected is air, provide the following information:
 - a. Indicate whether the source is a stack or ground-based area source.
 - b. If the source is a stack, provide the stack height in feet or meters. The stack height is the distance from the ground to the top of the stack.
 - c. If the source is an area source (e.g., a waste pile, surface impoundment, landfill, valve, pump seal, or storage tank vent), provide an estimate of the surface area or area of the release source including the appropriate unit such as square feet, square meters, or acres.
2. **Surface Water** - If the medium affected is surface water, provide the following information:
 - a. If the release affects any surface water body, give the name of the water body.
 - b. If the release affects a stream, give the "stream order" or the average flow rate (in cubic feet per second). This information can be obtained from your state water resource division or USGS. If you cannot locate this information, use the chart below to estimate the flow rate according to the velocity of the stream. If the velocity of the stream fluctuates during the year, use the average velocity when calculating average flow rate.
 - c. If the release affects a lake, or other large surface water body (e.g., a bay) give the surface area of the lake (in acres) and the average depth (in feet or meters). Below are sources of information for estimating the average lake depth.
3. **Soil or Ground Water** - If the medium affected is soil or ground water, provide the following information:
 - a. If the release is on or under ground, indicate the distance to the closest public water supply well within a two-mile radius of the site. Information regarding the location of public water supply wells may be available through the county office that issues permits for wells.

Estimated Average Stream Flow Rates

Stream Order	Mean Flow (CFS)	Mean Velocity (feet/sec)
1	0.65	1.0
2	3.10	1.3
3	15.00	1.5
4	71.00	1.8
5	340.00	2.3
6	1,600.00	2.7
7	7,600.00	3.3
8	56,000.00	3.9
9	171,000.00	5.6
10	810,000.00	5.9

Sources of Information for Estimating Average Lake Depth

If the lake is large enough to be navigable, your local Coast Guard office will have a navigation chart that will provide the average depth of the lake. For smaller lakes, you may estimate the average depth of the lake by relying on your knowledge of the use of the lake and the surrounding area, and your best professional judgment.

Optional Information - The following information is not required to comply with the regulation; however, such information will assist EPA in evaluating the risks associated with a continuous release. If the information below is not provided, conservative values will be used to evaluate the risks associated with the continuous release.

1. If the source is a stack release to air, provide the: (a) inside diameter of the stack; (b) gas exit velocity; and (c) gas temperature.
2. If the release affects surface water, provide the average velocity of the surface water.

Continuous Release Reporting Form

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Expiration Date: 11-30-2018

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 1173774

Part C: Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source.

Name of Source:

Arlington North Barn Numbers 13-26 & 3 Pullet Houses = H, I, & J.
AN13 = 07/08, AN14 = 09/08, AN15 = 11/08, AN16 = 01/09, AN17 = 03/09, AN18 = 05/09, AN19 = 07/09, AN20 = 09/09,
AN21 = 06/09, AN22 = 08/10, AN23 = 10/10, AN24 = 12/10, AN25 = 08/11, AN26 = 10/11,
ANPH = 05/14, ANPI = 07/14, ANPJ = 08/15

List each hazardous substance released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Hazardous Substance	CASRN #	Normal Range (in lbs., kg, or Ci per day)		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs., kg, or Ci)	Period of the Release
		Upper Bound	Lower Bound			
Ammonia	7664-41-7	896 lbs / day	0 lbs / day	365	Unknown	All 12 Months

List each mixture released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Mixture	Name of Hazardous Substance Components	CASRN #	Weight Percentage	Normal Range of Components (in lbs., kg, or Ci per day)		OR	Normal Range of Mixture (in lbs., kg, or Ci per day)		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs., kg or Ci)	Period of the Release
				Upper Bound	Lower Bound		Upper Bound	Lower Bound			
N/A											

EXAMPLES OF REPORTING SINGLE HAZARDOUS SUBSTANCES

In this example, your facility has a release which may qualify for reduced reporting as a continuous release. The hazardous substances released from the identified source (Stack A) are hydrogen chloride (7647010) and hydrogen flouride (7664393).

The volume of hydrogen chloride (HCl) released in 24-hour period is between 0 and 9,950 lbs. During the previoius year, 11,500 lbs of HCl was released. The release occurs once per week in February and June for a total of 8 days per year. The amount of hydrogen flouride (HFl) released is between 1 and 6,000 lbs. The release of HFl occurs approximately 120 days each year. A total amount released last year was 13,800 lbs.

For these releases from the specific source, you must provide the information outlined below.

<u>Name of Hazardous Substance</u>	<u>CASRN #</u>	<u>Normal Range</u> (in lbs., kg or Ci per day)		<u>Number of Days</u> <u>Release Occurs</u> (per year)	<u>Total Quantity</u> <u>Released in Previous Year</u> (in lbs., kg or Ci)	<u>Period of the</u> <u>Release</u>
		<u>Upper Bound</u>	<u>Lower Bound</u>			
Hydrogen Chloride (HCl)	7647010	9,950 lbs	0 lbs	8	11,500 lbs.	February; June
Hydrogen Flouride (HFl)	7664393	6,000 lbs	1 lb	120	13,800	All 12 months

EXAMPLE OF REPORTING A MIXTURE

In this example, if your facility wants to report the release of a mixture of hazardous substances, you must list each component of the mixture by hazardous substance and include its percentage by weight. For example, for the release of mixture Z, you must provide the following information about its components, ethylene oxide, acrolein, and 2,3,5-tri-chlorophenol:

				Normal Range of Components		OR	Normal Range of Mixture			Total Quantity of Mixture Released in Previous Year	Period of the Release
<u>Name of Mixture</u>	<u>Name of Hazardous Substance Components</u>	<u>CASRN #</u>	<u>Weight Percentage</u>	<u>Upper Bound</u>	<u>Lower Bound</u>		<u>Upper Bound</u>	<u>Lower Bound</u>	<u>Number of Days Release Occurs (per year)</u>	<u>(in lbs., kg or Ci)</u>	
Z	(components listed below)						100 lbs	0 lbs	365	79,500 lbs	All 12 Months
Z	Ethylene oxide	75218	10%	10 lbs	0 lbs						
Z	Acrolein	107028	15%	15 lbs	0 lbs						
Z	2,3,5-tri-chlorophenol	933788	20%	20 lbs	0 lbs						

INSTRUCTIONS

SECTION II: SOURCE INFORMATION

(Part C)

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

Part C - Identity and Quantity of Each Hazardous Substance or Mixture Released:

For each source, you must report information about the identity and quantity of the hazardous substances released from the source. In particular, you must identify the normal range of each release and the total annual quantity released during the previous year from each source.

You are not necessarily required to monitor releases to determine the normal range of the release. You may establish the normal range by using engineering estimates of releases under various operating conditions, knowledge of the operating history of the facility, experience with operating processes, professional judgment, or any other method that has a sound technical basis. EPA will use the upper bound of the normal range to estimate the risks to human health and the environment posed by the hazardous substance release.

To provide the required information regarding the quantity of the hazardous substance released from each identified source, you should begin by determining whether the release is a single hazardous substance or a mixture of hazardous substances.

Normal Range

The normal range of a continuous release includes all releases of a hazardous substance (in pounds, kilograms, or curies) reported or occurring during any 24-hour period under normal operating conditions during the previous year. Only releases that are both continuous and stable in quantity and rate may be included in the normal range.

Reporting Single Hazardous Substances - For each source, follow the directions below to report each hazardous substance released from the source that is a single hazardous substance or a component of a mixture that you wish to report separately.

1. Identify the hazardous substance released by name and by Chemical Abstracts Service Registry Number (CASRN). The CASRN for a hazardous substance can be located in any material safety data sheet or in most chemical supplier company catalogues.
2. Provide the upper and lower bounds of the normal range of the release from the identified source (i.e., quantity in pounds, kilograms, or curies) during the previous year.
3. Estimate the total annual amount (in pounds, kilograms, or curies) of the hazardous substance released from the identified source during the previous year.
4. Specify the frequency of the release by indicating the number of days the release occurs per year from the identified source. Stating "continuous" is not sufficient, as one source may be continuously operating 365 days a year, while another source may be continuously operating on weekdays, 261 days a year.
5. Indicate the actual months the release occurs.

Reporting a Mixture - For each source, follow the directions below to report each mixture released from the source.

1. Identify the mixture by name (e.g., Blue Pigment #25).
2. Identify each hazardous substance component of the mixture by name and CASRN.
3. Estimate the percentage by weight of each hazardous substance component of the mixture.
4. Provide the upper and lower bounds (i.e., quantity in pounds, kilograms, or curies) of the normal range of each hazardous substance component of the mixture that was released from this source. To calculate the upper bound of the normal range of each hazardous substance component, multiply the weight percentage of each component by the upper bound quantity of the mixture.
5. Provide the upper and lower bounds (i.e., quantity in pounds, kilograms, or curies) of the normal range of the mixture that was released from the identified source during the previous year.
6. Specify the frequency of the release by indicating the number of days the release occurs per year from the identified source. Stating "continuous" is not sufficient, as one source may be continuously operating 365 days a year, while another source may be continuously operating on weekdays, 261 days a year.
7. Estimate the total annual quantity (in pounds, kilograms, or curies) of the mixture that was released from the identified source during the previous year.
8. Indicate the actual months the release occurs.

Continuous Release Reporting Form

Form Approved OMB No. 2050-0086
Expiration Date: 11-30-2018

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 1173774

Calculation of the SSI Trigger

For EACH hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance.

Name of Hazardous Substance: Ammonia

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

<u>Name of Source(s)</u>	<u>Upper Bound of the Normal Range of the Release (specify lbs., kg., or Ci)</u>
Barn #13-26 & Pullet Houses H, I, & J	896 lbs.

TOTAL - SSI trigger for this hazardous substance release*: 896 lbs.

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

INSTRUCTIONS

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

After you provide the required information for all sources of continuous releases from your facility, you must aggregate information of a hazardous substance release from all sources to determine the SSI trigger (upper bound of the normal range) for each hazardous substance released at your facility.

The SSI trigger of a particular hazardous substance is calculated by aggregating the upper bounds of the hazardous substance released across all sources at a facility.

If you are aggregating CERCLA hazardous substance releases from separate, contiguous, or adjacent facilities and reporting them in a single report, aggregate the upper bound of the normal range of the hazardous substance released from all sources at the site to determine the SSI trigger. If you aggregate your releases across facilities, the SSI trigger must also be site-specific, not facility-specific. Aggregating releases across facilities at the same site may reduce your reporting burden; however, EPA will evaluate the risks associated with the releases as if the releases were from one facility.

To calculate the SSI trigger for each hazardous substance you should:

1. List each specific source name and enter the upper bound of the normal range of the release from that source. If the identified hazardous substance is a component of a mixture, enter the upper bound of the normal range for that component of the mixture (as determined in Section II, Part C).
2. Aggregate the upper bound quantities from each source of the release. Report these totals as the SSI trigger for the hazardous substance. The example that is provided below illustrates the calculation of the SSI trigger for a release of ammonia.

The above method for calculating the SSI trigger of a hazardous substance assumes that all releases of the same hazardous substance occur simultaneously (i.e., over the same 24-hour period). To the extent that the frequency of the release differs, you may adjust the SSI trigger so that it more accurately reflects the frequency and quantity of the hazardous substance released from all sources over a 24-hour period. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility. The normal range of the release includes all continuous releases previously reported or occurring over a 24-hour period during the previous year.

Calculation of the SSI Trigger for a Hazardous Substance

Hazardous Substance	Source	Upper Bound
Ammonia	Tank Vents in Building #1	120 lbs.
	Valves in Building #5	115 lbs.
	Upper Bound for Ammonia	<u>235 lbs.</u>

For the purposes of this example, it is assumed that the only sources of the ammonia release at the facility are the Tank Vents in Building #1 and the Valves in Building #5.

Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection of information is estimated to average 10 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. **Do not send the completed form to this address.**

CTS'.3 68 337

Arlington South

Continuous Release Reporting Form

Form Approved OMB No. 2050-0086
Expiration Date: 11-30-2018

SECTION I: GENERAL INFORMATION

CR-ERNS Number: 1173773

Date of Initial Release: April, 1998

Date of Initial Call to NRC: 3/21/2017

Type of Report: Select from the drop-down list, the type of report that you are submitting

Written Notification of a Change to Initial Notification

Signed Statement: I certify that the hazardous substance releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.32 and that all submitted information is accurate and current to the best of my knowledge.

Date 3/22/2017

Name and Position Glenn Hickman, President

Signature



Part A. Facility or Vessel Information

Name of Facility or Vessel Hickman's Family farms - Arlington South

Person in Charge of Facility or Vessel

Name Glenn Hickman

Position President

Phone Number 623-872-2308

Alt Phone No. 623-764-2182

Facility Address or Vessel Port of Registration

Street 32425 W. Salome Highway

County Maricopa

City Arlington State AZ Zip Code 85322

Dun and Bradstreet Number for Facility 035864263

Facility/Vessel Location

Latitude Deg 33 Min 21 Sec 41.8458

Longitude Deg -112 Min 45 Sec 22.694

Vessel LORAN Coordinates

N/A

NOTE: Latitude/Longitude information can be obtained at the following websites: <http://www.satsig.net/maps/lat-long-finder.htm>, <http://earth.google.com/>, and <http://www.census.gov/geo/landview/>. Do not use P.O. Box, Rural Route or Mailing Address. Use physical location only.

Part B. Population Information

Population Density

Select from the drop-down list, the range that describes the population density within a one-mile radius of your facility or vessel. 0 - 50 persons

Sensitive Populations and Ecosystems within One-Mile Radius

Sensitive Populations or Ecosystems (e.g., elementary schools, hospitals, retirement communities, or wetlands)

Estimated Distance and Direction from Facility, if Known

N/A

N/A

INSTRUCTIONS

SECTION I: GENERAL INFORMATION

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

The information required in Section I of the initial written report and follow-up reports includes general information identifying your facility, as well as information regarding the area in which your facility is located. This general information is important because it provides a better understanding of the potential risks resulting from exposure from the facility's release. A signed statement asserting that the continuous release is continuous and stable in quantity and rate, and that the information supplied is accurate and current to the best of your knowledge, is also required in Section I.

In addition, Section I must clearly identify the type of written report that you are submitting (i.e., an initial written report, a first anniversary follow-up report, or a written report of the change in source or composition of a previously reported release). You must also include information on the initial notification of the release, such as the date of the release and the date of the initial call. For CERCLA hazardous substances, the CR-ERNS number assigned to you by the NRC will also be required.

Type of Report - Select from drop-down list.

Initial Written Notification - Within 30 days of the initial telephone notification, you are required to submit an initial written report to the appropriate EPA Regional Office, SERC, and LEPC (for releases of CERCLA hazardous substances) and to only the appropriate SERC and LEPC (for releases of non-CERCLA EHSs). The purpose of this report is to confirm your intent to report your release as a continuous release under Section 103(f)(2), and to provide government response officials with sufficient information about your release to enable them to determine if the release qualifies as a continuous release.

First Anniversary Follow-up Report - For reports of releases of CERCLA hazardous substances, within 30 days of the first anniversary of your initial written report, you are required to reassess your initial continuous release report and gather the information on all of the reported substances being released. After doing this, you must submit a one-time written first anniversary follow-up report to the appropriate EPA Regional Office. Please note that the first anniversary report must be sent to the appropriate EPA Regional Office for all reports of CERCLA hazardous substances, but is not required for reports of non-CERCLA EHSs.

Written Notification of a Change to Initial Notification and/or Written Notification of a Change to Follow-up Report -

[NOTE: For these reports, select the report type that reflects the notification or report for which you are reporting a change.]

- = Notification of a change in source or composition, which is treated as if it were a new release (i.e., with a telephone call to the NRC, SERC, and LEPC, followed by a written report and a first anniversary follow-up report);
- = Notification of a change in the normal range, if there is a change in the release such that the quantity of the release exceeds the upper bound of the reported normal range, the release must be reported as a statistically significant increase;
- = For CERCLA substances only, notification of any other reported information (e.g., a change in facility ownership) in a written letter to only the EPA Region.

Part A. Facility or Vessel Information -

1. The complete name of your facility (and company identifier where appropriate). If multiple facilities are included in your written report, provide the plant site name with the name of the facility.
2. The full address of your facility, including the street address or highway marker, city, county, state, and zip code. A post office box number should not be used as the facility address. The address provided should be the location of the facility where the hazardous substance release occurs.
3. The location of your facility by its latitude and longitude in units of degrees, minutes, and seconds. See below for helpful hints on how to obtain the latitude and longitude coordinates of your facility.
4. The nine digit number assigned by Dun and Bradstreet (D&B) to your facility. This number can be obtained via telephone by an officer of your company from the national office of Dun and Bradstreet (at 1-800-234-3867). If your facility has not been assigned a D&B number, please specify that the information is not applicable. http://www.dnb.com/US/duns_update/
5. For reports of CERCLA hazardous substances, the CR-ERNS number assigned by the NRC when you made the initial telephone report. Be certain to include the CR-ERNS number on each page of your report.
6. The name, telephone number (including area code), and an alternate telephone number for the person in charge of your facility.

SOURCES OF INFORMATION FOR IDENTIFYING THE LOCATION OF YOUR FACILITY

Sources of data on latitude and longitude coordinates of your facility include EPA permits (e.g., NPDES permits), county property records, facility blueprints, and site plans. In addition, information on the latitude and longitude of your facility may be obtained from a United States Geological Survey (USGS) topographical map. These maps are available in both the 7.5 minute and 15 minute series. These maps may be obtained from the USGS distribution center at your local public library. If you would like to order a map from USGS, contact: U.S. Geological Survey - Information Services, Box 25286, Denver, CO 80225, call 1-888-ASK-USGS (1-888-275-8747)/<http://library.usgs.gov/maplinks.html>

If you are not certain on which map your site is located, consult the index of topographic maps for your state, which may be obtained from USGS free of charge.

USGS maps are also available at commercial dealers such as surveyors or outdoor recreation equipment dealers.

Latitude/Longitude information can be obtained at the following websites: <http://www.satsig.net/maps/lat-long-finder.htm>, <http://earth.google.com/>, and <http://www.census.gov/geo/landview/>.

Part B. Population Information -

1. Choose the range from the drop down list, the range that most accurately describes the population density within a one-mile radius of your facility.
2. Identify and describe the location of any sensitive populations or ecosystems within a one-mile radius of your facility. If possible, describe the location of the populations or ecosystems in terms of distance and direction from your facility (e.g., located ¼ mile northwest of the facility). Exact addresses are not required.

Sensitive populations - populations likely to be more susceptible than average individuals to the effects of exposure to a hazardous substance. Examples of sensitive populations are elementary school children, retirement communities, or hospitals.

Sensitive ecosystems - environments likely to be more susceptible than average environments to the effects of exposure to a hazardous substance, or ecosystems that have been designated for special protection by Federal or state governments. Example of sensitive ecosystems includes wetlands.

Continuous Release Reporting Form

Form Approved OMB No. 2050-0086
Expiration Date: 11-30-2018

SECTION II: SOURCE INFORMATION

CR-ERNS Number: 1173773

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet.

Name of Source:

Arlington South Barns = Numbers 1 - 12, and 7 Pullet Houses = A, B, C, D, E, F, G
AS1 = 8/98, AS2 = 10/98, AS3 = 2/99, AS4 = 6/99, AS5 = 10/99, AS6 = 2/00, AS7 = 7/00, AS8 = 6/01,
AS9 = 10/01, AS10 = 2/02, AS11 = 6/07, AS12 = 8/07, ASPA = 4/98, ASPB = 5/98, ASPC = 4/07, ASPD = 4/07,
ASPE = 2/01, ASPF = 6/01, ASPG = 8/10

1. Indicate whether the release from this source is either:

☒ Continuous without interruption

OR

☐ routine, anticipated, intermittent & incidental to

Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

2. Provide a brief statement describing the basis for stating that the release is continuous and stable in quantity and rate. If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate given the **note** above.

Manure is continuously removed from the lay house via the conveyor belt and deposited in compost rows within the manure drying area of the house.

The manure is dried via fans that reduce the moisture, thereby reducing ammonia emissions. Each manure drying area is completely cleaned out at a minimum of every 7 days and a maximum of every 14 days.

The manure is removed from each house 5-6 days per week. Each house is completely emptied every 14 days.

3. Identify below how you established the pattern or release and calculated release estimates.

☐ Release data ☒ Knowledge of Operating Procedures ☐ Engineering estimate ☒ Best Professional judgment

Other -

INSTRUCTIONS

SECTION II: SOURCE INFORMATION

(Part A)

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

General overview - When completing your written reports, you must take into consideration all sources of the release from your facility. For example, if the aggregate amount of a particular hazardous substance released within 24 hours from your facility equals or exceeds an RQ, then each source of the particular release must be identified, even if some releases from individual sources do not equal or exceed the RQ. The purpose of requiring information on the source(s) of the release is to provide EPA with sufficient information to evaluate the risk associated with the continuous release. Providing this information accurately in the initial written and first anniversary follow-up report will minimize future requests by EPA for additional information or clarification.

In this section of the written report, you should identify and describe separately each continuous release source. If the continuous release of the same hazardous substance comes from two or more sources (e.g., two stacks), then information should be reported separately for each of the sources. For example, if a stack is one of several sources of a hazardous substance release at your facility, you must provide information on that stack including: the stack height; the identity of the hazardous substance(s) being released from the stack; the quantity released; and the frequency of the release from the stack. If you have a release of a particular hazardous substance from three stacks, you should report each stack separately and provide the required information specified for each stack.

Although the continuous release reporting regulation allows multiple concurrent releases of the same CERCLA hazardous substance to be considered as if they were one continuous release, aggregate reporting of such releases from different sources complicates risk analyses. Area sources are most readily aggregated for purposes of continuous release reporting and risk evaluation when the frequency of the release from each source is the same. Similarly, aggregated stack releases are most readily evaluated if the frequency of the release from each stack is the same and the stack configurations (e.g., stack height, diameter, throughput) are the same. If you elect to aggregate releases across facilities, be certain to identify information about each source of the release from all of your facilities. Also, note that if you aggregate your releases, EPA may request clarifying information about the releases from each of the individual sources.

Identification of sources - In Section II, you must identify (i.e., name) and describe each continuous release source. There are several ways to name release sources. It is important to: (1) provide a name that clearly identifies the source (e.g., centrifugal processor A, rather than Unit A); and (2) avoid giving two or more sources the same name. It is also important to remember when naming your sources that EPA, at any time, may contact you with questions regarding releases from one of your named sources. It would be prudent, therefore, to name the sources at your facility in a manner that will be easy for you and other employees to identify them. For example, if your plant has four stacks, two wastepiles, and twenty-four valves, you may name the sources as follows: Stack #1; Stack #2; Stack #3; Stack #4; Wastepile #1; Wastepile #2; and Valves in Building #2. Note that the "Valves in Building #2" are aggregated in this example and reported as a single source.

Required information - Section II, Source Information, contains three Parts (A, B, and C). You must provide the information required in each of these Parts for each continuous release source. Be sure to place the name of the source on all pages associated with that specific source. There is one exception to this rule. If the release from any individual source will affect more than one environmental medium (e.g., a wastepile releasing to air and ground water) it must be modeled separately. Therefore, any source that affects two different media should be treated as two separate sources for purposes of reporting. This is desirable because EPA must analyze each release pathway separately to properly evaluate the risks posed by the continuous release. In addition, because the hazardous substance releases to each medium may differ in frequency and quantity, it is useful to distinguish the releases for purposes of risk evaluation.

Part A - Basis for Asserting the Release is Continuous and Stable in Quantity and Rate:

You must first identify the source of the release (include the name of the source in all subsequent parts), then briefly describe the basis for stating that the release is continuous and stable in quantity and rate. Your description of the basis for stating that the hazardous substance release is continuous and stable in quantity and rate should include whether the release is continuous without interruption, or is a routine, anticipated, intermittent release. It should also include information on when the release is expected to occur (i.e., evidence of predictability of the release). One example of a release that may be predictable and regular is fugitive emissions from valves that occur at different rates over the course of a production cycle as the pressure inside the system changes. Although the rate of such fugitive emissions may not be strictly uniform, it may be predictable in the sense that the rate and amount of the release vary in a similar manner each time the process is operated or decompression occurs.

Your description should also identify the activity that results in the release (e.g., batch process, operating procedure, loading/unloading, maintenance activity, filling of storage tanks). If the release occurs because of a malfunction, this should be explained fully. Note that only certain releases due to malfunctions can qualify as a continuous release. Please refer to the discussion in the preamble of the continuous release final rule at 55 FR 30171, Jul. 24, 1990.

Finally, your description should include information on how you established the pattern of the release and calculated release estimates (e.g., engineering estimates, your best professional judgment, past release data).

For each source identified, provide the following information:

- (1) Indicate whether the release is continuous without interruption or abatement or routine, anticipated, and intermittent.
- (2) Identify the activity or activities that cause the release from the source.
- (3) If the release results from a malfunction, describe the malfunction and explain why the release should be considered continuous and stable in quantity and rate.
- (4) Identify how you established the pattern of the release and calculated release estimates.

Continuous Release Reporting Form

Form Approved OMB No. 2050-0086
Expiration Date: 11-30-2018

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 1173773

Name of Source:

Arlington South Barns - Numbers 1 - 12, and 7 Pullet Houses - A, B, C, D, E, F, G)
AS1 = 8/98, AS2 = 10/98, AS3 = 2/99, AS4 = 6/99, AS5 = 10/99, AS6 = 2/00, AS7 = 7/00, AS8 = 6/01,
AS9 = 10/01, AS10 = 2/02, AS11 = 6/07, AS12 = 8/07, ASPA = 4/98, ASPB = 5/98, ASPC = 4/07,
ASPD = 4/07, ASPE = 2/01, ASPF = 6/01, ASPG = 8/10

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II, Parts A, B, and C, of this format for EACH medium affected.

☒ **AIR** If the medium affected is air, please also specify whether the source is a **stack** or a ground-based **area source**.

☐ **Stack** Indicate stack height in feet or meters

Ground Based

☐ **SURFACE WATER**

If the release affects any **surface water body**, give the name of the water body.

☐ **Surface Water Body**

N/A

☐ **Stream**

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.

Stream Order

N/A

OR

Average Flow Rate (cubic feet/second)

N/A

☐ **Lake**

Surface area of lake (in acres)

N/A

Average depth of lake (in meters)

N/A

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.

☐ **SOIL OR GROUND WATER**

If the release is on or under ground, the location of public water supply wells within two miles.

N/A All manure is contained in the manure drying area within the lay house.

Optional Information

The following information is not required to comply with the regulation; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter (feet or meters)

N/A

Gas Exit Velocity (ft or meters/sec)

N/A

Gas Temp (degrees Fahrenheit, Kelvin, or Celsius)

N/A

For a release to surface water, provide the following information, if available:

Average velocity of surface water (feet/second)

N/A

INSTRUCTIONS

SECTION II: SOURCE INFORMATION

(Part B)

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

Part B - Specific Information on the Source:

You must identify the environmental medium (i.e., air, surface water, soil, or ground water) affected by the hazardous substance release from each source identified in Section II, Part A. In addition, you must provide specific information on the source and its affected environment. It is important to remember that if you have a release from a single source that affects two different media (e.g., gypsum stack releasing radon to air and radionuclides to ground water), you should treat the release to each medium as a separate source for purposes of reporting. Another important point to remember when completing all sections of the written report is to include the appropriate units, such as kilograms, meters, or curies.

Environmental medium - Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from the identified source.

1. **Air** - If the medium affected is air, provide the following information:
 - a. Indicate whether the source is a stack or ground-based area source.
 - b. If the source is a stack, provide the stack height in feet or meters. The stack height is the distance from the ground to the top of the stack.
 - c. If the source is an area source (e.g., a waste pile, surface impoundment, landfill, valve, pump seal, or storage tank vent), provide an estimate of the surface area or area of the release source including the appropriate unit such as square feet, square meters, or acres.
2. **Surface Water** - If the medium affected is surface water, provide the following information:
 - a. If the release affects any surface water body, give the name of the water body.
 - b. If the release affects a stream, give the "stream order" or the average flow rate (in cubic feet per second). This information can be obtained from your state water resource division or USGS. If you cannot locate this information, use the chart below to estimate the flow rate according to the velocity of the stream. If the velocity of the stream fluctuates during the year, use the average velocity when calculating average flow rate.
 - c. If the release affects a lake, or other large surface water body (e.g., a bay) give the surface area of the lake (in acres) and the average depth (in feet or meters). Below are sources of information for estimating the average lake depth.
3. **Soil or Ground Water** - If the medium affected is soil or ground water, provide the following information:
 - a. If the release is on or under ground, indicate the distance to the closest public water supply well within a two-mile radius of the site. Information regarding the location of public water supply wells may be available through the county office that issues permits for wells.

Estimated Average Stream Flow Rates

Stream Order	Mean Flow (CFS)	Mean Velocity (feet/sec)
1	0.65	1.0
2	3.10	1.3
3	15.00	1.5
4	71.00	1.8
5	340.00	2.3
6	1,600.00	2.7
7	7,600.00	3.3
8	56,000.00	3.9
9	171,000.00	5.6
10	810,000.00	5.9

Sources of Information for Estimating Average Lake Depth

If the lake is large enough to be navigable, your local Coast Guard office will have a navigation chart that will provide the average depth of the lake. For smaller lakes, you may estimate the average depth of the lake by relying on your knowledge of the use of the lake and the surrounding area, and your best professional judgment.

Optional information - The following information is not required to comply with the regulation; however, such information will assist EPA in evaluating the risks associated with a continuous release. If the information below is not provided, conservative values will be used to evaluate the risks associated with the continuous release.

1. If the source is a stack release to air, provide the: (a) inside diameter of the stack; (b) gas exit velocity; and (c) gas temperature.
2. If the release affects surface water, provide the average velocity of the surface water.

Continuous Release Reporting Form

Form Approved OMB No. 2050-0086
Expiration Date: 11-30-2018

SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 1173773

Part C: Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source.

Name of Source: Arlington South Barns = Numbers 1 - 12, and 7 Pullet Houses = A, B, C, D, E, F, G)
AS1 = 8/98, AS2 = 10/98, AS3 = 2/99, AS4 = 6/99, AS5 = 10/99, AS6 = 2/00, AS7 = 7/00, AS8 = 6/01, AS9 = 10/01, AS10 = 2/02, AS11 = 6/07,
AS12 = 8/07, ASPA = 4/98, ASPB = 5/98, ASPC = 4/07, ASPD = 4/07, ASPE = 2/01, ASPF = 6/01, ASPG = 8/10

List each hazardous substance released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Hazardous Substance	CASRN #	Normal Range (in lbs., kg, or Ci per day)		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs., kg, or Ci)	Period of the Release
		Upper Bound	Lower Bound			
Ammonia	7664-41-7	991 lbs / day	0 lbs / day	365	Unknown	All 12 Months

List each mixture released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Mixture	Name of Hazardous Substance Components	CASRN #	Weight Percentage	Normal Range of Components (in lbs., kg, or Ci per day)		OR	Normal Range of Mixture (in lbs., kg, or Ci per day)		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs., kg or Ci)	Period of the Release
				Upper Bound	Lower Bound		Upper Bound	Lower Bound			
N/A											

EXAMPLES OF REPORTING SINGLE HAZARDOUS SUBSTANCES

In this example, your facility has a release which may qualify for reduced reporting as a continuous release. The hazardous substances released from the identified source (Stack A) are hydrogen chloride (7647010) and hydrogen flouride (7664393).

The volume of hydrogen chloride (HCl) released in 24-hour period is between 0 and 9,950 lbs. During the previoius year, 11,500 lbs of HCl was released. The release occurs once per week in February and June for a total of 8 days per year. The amount of hydrogen flouride (HFl) released is between 1 and 6,000 lbs. The release of HFl occurs approximately 120 days each year. A total amount released last year was 13,800 lbs.

For these releases from the specific source, you must provide the information outlined below.

<u>Name of Hazardous Substance</u>	<u>CASRN #</u>	<u>Normal Range</u> (in lbs., kg or Ci per day)		<u>Number of Days</u> <u>Release Occurs</u> (per year)	<u>Total Quantity</u> <u>Released in Previous Year</u> (in lbs., kg or Ci)	<u>Period of the</u> <u>Release</u>
		<u>Upper Bound</u>	<u>Lower Bound</u>			
Hydrogen Chloride (HCl)	7647010	9,950 lbs	0 lbs	8	11,500 lbs.	February; June
Hydrogen Flouride (HFl)	7664393	6,000 lbs	1 lb	120	13,800	All 12 months

EXAMPLE OF REPORTING A MIXTURE

In this example, if your facility wants to report the release of a mixture of hazardous substances, you must list each component of the mixture by hazardous substance and include its percentage by weight. For example, for the release of mixture Z, you must provide the following information about its components, ethylene oxide, acrolein, and 2,3,5-tri-chlorophenol:

<u>Name of Mixture</u>	<u>Name of Hazardous Substance</u> <u>Components</u>	<u>CASRN #</u>	<u>Weight</u> <u>Percentage</u>	<u>Normal Range of</u> <u>Components</u> (in lbs., kg or Ci per day)		OR	<u>Normal Range of</u> <u>Mixture</u> (in lbs., kg or Ci per day)		<u>Number of Days</u> <u>Release Occurs</u> (per year)	<u>Total Quantity of</u> <u>Mixture Released</u> <u>in Previous Year</u> (in lbs., kg or Ci)	<u>Period of</u> <u>the</u> <u>Release</u>
				<u>Upper</u> <u>Bound</u>	<u>Lower</u> <u>Bound</u>		<u>Upper</u> <u>Bound</u>	<u>Lower</u> <u>Bound</u>			
Z	(components listed below)						100 lbs	0 lbs	365	79,500 lbs	All 12 Months
Z	Ethylene oxide	75218	10%	10 lbs	0 lbs						
Z	Acrolein	107028	15%	15 lbs	0 lbs						
Z	2,3,5-tri-chlorophenol	933788	20%	20 lbs	0 lbs						

INSTRUCTIONS

SECTION II: SOURCE INFORMATION

(Part C)

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

Part C - Identity and Quantity of Each Hazardous Substance or Mixture Released:

For each source, you must report information about the identity and quantity of the hazardous substances released from the source. In particular, you must identify the normal range of each release and the total annual quantity released during the previous year from each source.

You are not necessarily required to monitor releases to determine the normal range of the release. You may establish the normal range by using engineering estimates of releases under various operating conditions, knowledge of the operating history of the facility, experience with operating processes, professional judgment, or any other method that has a sound technical basis. EPA will use the upper bound of the normal range to estimate the risks to human health and the environment posed by the hazardous substance release.

To provide the required information regarding the quantity of the hazardous substance released from each identified source, you should begin by determining whether the release is a single hazardous substance or a mixture of hazardous substances.

Normal Range

The normal range of a continuous release includes all releases of a hazardous substance (in pounds, kilograms, or curies) reported or occurring during any 24-hour period under normal operating conditions during the previous year. Only releases that are both continuous and stable in quantity and rate may be included in the normal range.

Reporting Single Hazardous Substances - For each source, follow the directions below to report each hazardous substance released from the source that is a single hazardous substance or a component of a mixture that you wish to report separately.

1. Identify the hazardous substance released by name and by Chemical Abstracts Service Registry Number (CASRN). The CASRN for a hazardous substance can be located in any material safety data sheet or in most chemical supplier company catalogues.
2. Provide the upper and lower bounds of the normal range of the release from the identified source (i.e., quantity in pounds, kilograms, or curies) during the previous year.
3. Estimate the total annual amount (in pounds, kilograms, or curies) of the hazardous substance released from the identified source during the previous year.
4. Specify the frequency of the release by indicating the number of days the release occurs per year from the identified source. Stating "continuous" is not sufficient, as one source may be continuously operating 365 days a year, while another source may be continuously operating on weekdays, 261 days a year.
5. Indicate the actual months the release occurs.

Reporting a Mixture - For each source, follow the directions below to report each mixture released from the source.

1. Identify the mixture by name (e.g., Blue Pigment #25).
2. Identify each hazardous substance component of the mixture by name and CASRN.
3. Estimate the percentage by weight of each hazardous substance component of the mixture.
4. Provide the upper and lower bounds (i.e., quantity in pounds, kilograms, or curies) of the normal range of each hazardous substance component of the mixture that was released from this source. To calculate the upper bound of the normal range of each hazardous substance component, multiply the weight percentage of each component by the upper bound quantity of the mixture.
5. Provide the upper and lower bounds (i.e., quantity in pounds, kilograms, or curies) of the normal range of the mixture that was released from the identified source during the previous year.
6. Specify the frequency of the release by indicating the number of days the release occurs per year from the identified source. Stating "continuous" is not sufficient, as one source may be continuously operating 365 days a year, while another source may be continuously operating on weekdays, 261 days a year.
7. Estimate the total annual quantity (in pounds, kilograms, or curies) of the mixture that was released from the identified source during the previous year.
8. Indicate the actual months the release occurs.

Continuous Release Reporting Form

Form Approved OMB No. 2050-0086
Expiration Date: 11-30-2018

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 1173773

Calculation of the SSI Trigger

For EACH hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance.

Name of Hazardous Substance: Ammonia

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., kg., or Ci)
Barn #s 1 - 12, & Pullet Houses A - G	991 lbs.

TOTAL - SSI trigger for this hazardous substance release*: 991 lbs.

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

INSTRUCTIONS

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

After you provide the required information for all sources of continuous releases from your facility, you must aggregate information of a hazardous substance release from all sources to determine the SSI trigger (upper bound of the normal range) for each hazardous substance released at your facility.

The SSI trigger of a particular hazardous substance is calculated by aggregating the upper bounds of the hazardous substance released across all sources at a facility.

If you are aggregating CERCLA hazardous substance releases from separate, contiguous, or adjacent facilities and reporting them in a single report, aggregate the upper bound of the normal range of the hazardous substance released from all sources at the site to determine the SSI trigger. If you aggregate your releases across facilities, the SSI trigger must also be site-specific, not facility-specific. Aggregating releases across facilities at the same site may reduce your reporting burden; however, EPA will evaluate the risks associated with the releases as if the releases were from one facility.

To calculate the SSI trigger for each hazardous substance you should:

- 1. List each specific source name and enter the upper bound of the normal range of the release from that source. If the identified hazardous substance is a component of a mixture, enter the upper bound of the normal range for that component of the mixture (as determined in Section II, Part C).*
- 2. Aggregate the upper bound quantities from each source of the release. Report these totals as the SSI trigger for the hazardous substance. The example that is provided below illustrates the calculation of the SSI trigger for a release of ammonia.*

The above method for calculating the SSI trigger of a hazardous substance assumes that all releases of the same hazardous substance occur simultaneously (i.e., over the same 24-hour period). To the extent that the frequency of the release differs, you may adjust the SSI trigger so that it more accurately reflects the frequency and quantity of the hazardous substance released from all sources over a 24-hour period. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility. The normal range of the release includes all continuous releases previously reported or occurring over a 24-hour period during the previous year.

Calculation of the SSI Trigger for a Hazardous Substance

Hazardous Substance	Source	Upper Bound
Ammonia	Tank Vents in Building #1	120 lbs.
	Valves in Building #5	115 lbs.
	Upper Bound for Ammonia	235 lbs.

For the purposes of this example, it is assumed that the only sources of the ammonia release at the facility are the Tank Vents in Building #1 and the Valves in Building #5.

Paperwork Reduction Act Notice

*The public reporting and recordkeeping burden for this collection of information is estimated to average 10 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. **Do not send the completed form to this address.***

CTS. 368336

Tonopah

Continuous Release Reporting Form

Form Approved OMB No. 2050-0086
Expiration Date: 11-30-2018

SECTION I: GENERAL INFORMATION

CR-ERNS Number: 1173776

Date of Initial Release: September, 2014

Date of Initial Call to NRC: 3/21/2017

Type of Report: Select from the drop-down list, the type of report that you are submitting

Initial Written Notification

Signed Statement: I certify that the hazardous substance releases described herein are continuous and stable in quantity and rate under the definitions in 40 CFR 302.8(a) or 355.32 and that all submitted information is accurate and current to the best of my knowledge.

Date 3/22/2017

Name and Position Glenn Hickman, President

Signature



Part A. Facility or Vessel Information

Name of Facility or Vessel Hickman's Family Farms - Tonopah

Person in Charge of Facility or Vessel

Name Glenn Hickman

Position President

Phone Number 623-872-2308

Alt Phone No. 623-764-2182

Facility Address or Vessel Port of Registration

Street 41717 W. Indian School Road

County Maricopa

City Tonopah State AZ Zip Code 85364

Dun and Bradstreet Number for Facility 035864263

Facility/Vessel Location

Latitude Deg 33 Min 29 Sec 18.65

Longitude Deg -112 Min 57 Sec 4.4

Vessel LORAN Coordinates

N/A

NOTE: Latitude/Longitude information can be obtained at the following websites: <http://www.satsig.net/maps/lat-long-finder.htm>, <http://earth.google.com/>, and <http://www.census.gov/geo/landview/>. Do not use P.O. Box, Rural Route or Mailing Address. Use physical location only.

Part B. Population Information

Population Density

Select from the drop-down list, the range that describes the population density within a one-mile radius of your facility or vessel.

101 - 500 persons

Sensitive Populations and Ecosystems within One-Mile Radius

Sensitive Populations or Ecosystems (e.g., elementary schools, hospitals, retirement communities, or wetlands)

Estimated Distance and Direction from Facility, if Known

N/A

N/A

INSTRUCTIONS

SECTION I: GENERAL INFORMATION

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

The information required in Section I of the initial written report and follow-up reports includes general information identifying your facility, as well as information regarding the area in which your facility is located. This general information is important because it provides a better understanding of the potential risks resulting from exposure from the facility's release. A signed statement asserting that the continuous release is continuous and stable in quantity and rate, and that the information supplied is accurate and current to the best of your knowledge, is also required in Section I.

In addition, Section I must clearly identify the type of written report that you are submitting (i.e., an initial written report, a first anniversary follow-up report, or a written report of the change in source or composition of a previously reported release). You must also include information on the initial notification of the release, such as the date of the release and the date of the initial call. For CERCLA hazardous substances, the CR-ERNS number assigned to you by the NRC will also be required.

Type of Report - Select from drop-down list.

Initial Written Notification - Within 30 days of the initial telephone notification, you are required to submit an initial written report to the appropriate EPA Regional Office, SERC, and LEPC (for releases of CERCLA hazardous substances) and to only the appropriate SERC and LEPC (for releases of non-CERCLA EHSs). The purpose of this report is to confirm your intent to report your release as a continuous release under Section 103(f)(2), and to provide government response officials with sufficient information about your release to enable them to determine if the release qualifies as a continuous release.

First Anniversary Follow-up Report - For reports of releases of CERCLA hazardous substances, within 30 days of the first anniversary of your initial written report, you are required to reassess your initial continuous release report and gather the information on all of the reported substances being released. After doing this, you must submit a one-time written first anniversary follow-up report to the appropriate EPA Regional Office. Please note that the first anniversary report must be sent to the appropriate EPA Regional Office for all reports of CERCLA hazardous substances, but is not required for reports of non-CERCLA EHSs.

Written Notification of a Change to Initial Notification and/or Written Notification of a Change to Follow-up Report -

[NOTE: For these reports, select the report type that reflects the notification or report for which you are reporting a change.]

- = Notification of a change in source or composition, which is treated as if it were a new release (i.e., with a telephone call to the NRC, SERC, and LEPC, followed by a written report and a first anniversary follow-up report);
- = Notification of a change in the normal range, if there is a change in the release such that the quantity of the release exceeds the upper bound of the reported normal range, the release must be reported as a statistically significant increase;
- = For CERCLA substances only, notification of any other reported information (e.g., a change in facility ownership) in a written letter to only the EPA Region.

Part A. Facility or Vessel Information -

1. The complete name of your facility (and company identifier where appropriate). If multiple facilities are included in your written report, provide the plant site name with the name of the facility.
2. The full address of your facility, including the street address or highway marker, city, county, state, and zip code. A post office box number should not be used as the facility address. The address provided should be the location of the facility where the hazardous substance release occurs.
3. The location of your facility by its latitude and longitude in units of degrees, minutes, and seconds. See below for helpful hints on how to obtain the latitude and longitude coordinates of your facility.
4. The nine digit number assigned by Dun and Bradstreet (D&B) to your facility. This number can be obtained via telephone by an officer of your company from the national office of Dun and Bradstreet (at 1-800-234-3867). If your facility has not been assigned a D&B number, please specify that the information is not applicable. http://www.dnb.com/US/duns_update/
5. For reports of CERCLA hazardous substances, the CR-ERNS number assigned by the NRC when you made the initial telephone report. Be certain to include the CR-ERNS number on each page of your report.
6. The name, telephone number (including area code), and an alternate telephone number for the person in charge of your facility.

SOURCES OF INFORMATION FOR IDENTIFYING THE LOCATION OF YOUR FACILITY

Sources of data on latitude and longitude coordinates of your facility include EPA permits (e.g., NPDES permits), county property records, facility blueprints, and site plans. In addition, information on the latitude and longitude of your facility may be obtained from a United States Geological Survey (USGS) topographical map. These maps are available in both the 7.5 minute and 15 minute series. These maps may be obtained from the USGS distribution center at your local public library. If you would like to order a map from USGS, contact: U.S. Geological Survey - Information Services, Box 25286, Denver, CO 80225, call 1-888-ASK-USGS (1-888-275-8747)/<http://library.usgs.gov/maplinks.html>

If you are not certain on which map your site is located, consult the index of topographic maps for your state, which may be obtained from USGS free of charge. USGS maps are also available at commercial dealers such as surveyors or outdoor recreation equipment dealers.

Latitude/Longitude information can be obtained at the following websites: <http://www.satsig.net/maps/lat-long-finder.htm>, <http://earth.google.com/>, and <http://www.census.gov/geo/landview/>.

Part B. Population Information -

1. Choose the range from the drop down list, the range that most accurately describes the population density within a one-mile radius of your facility.
2. Identify and describe the location of any sensitive populations or ecosystems within a one-mile radius of your facility. If possible, describe the location of the populations or ecosystems in terms of distance and direction from your facility (e.g., located ¼ mile northwest of the facility). Exact addresses are not required.

Sensitive populations - populations likely to be more susceptible than average individuals to the effects of exposure to a hazardous substance. Examples of sensitive populations are elementary school children, retirement communities, or hospitals.

Sensitive ecosystems - environments likely to be more susceptible than average environments to the effects of exposure to a hazardous substance, or ecosystems that have been designated for special protection by Federal or state governments. Example of sensitive ecosystems includes wetlands.

Continuous Release Reporting Form

Form Approved OMB No. 2050-0086
Expiration Date: 11-30-2018

SECTION II: SOURCE INFORMATION

CR-ERNS Number: 1173776

Part A: Basis for Asserting the Release is Continuous and Stable in Quantity and Rate.

For EACH source of a release of a hazardous substance or mixture from your facility or vessel, provide the following information on a SEPARATE sheet.

Name of Source:

Tonopah Barn Numbers 1-14 and Pullet House L
T1 = 9/14, T2 = 11/14, T3 = 01/15, T4 = 03/15, T5 = 05/15, T6 = 07/15, T7 = 09/15, T8 = 11/15,
T9 = 01/16, T10 = 03/16, T11 = 11/16, T12 = 01/17, T13 = 03/17, T14 = 05/17, PL = 07/16

1. Indicate whether the release from this source is either:



Continuous without interruption

OR



routine, anticipated, intermittent & incidental to

Note that unanticipated events, such as spills, pipe ruptures, equipment failures, emergency shutdowns, or accidents, do not qualify for reduced reporting under CERCLA section 103(f)(2). Unanticipated events are not incidental to normal operations and, by definition, are not continuous or anticipated, and are not sufficiently predictable or regular to be considered stable in quantity and rate.

2. Provide a brief statement describing the basis for stating that the release is continuous and stable in quantity and rate. If malfunction, describe the malfunction and explain why the release from the malfunction should be considered continuous and stable in quantity and rate given the note above.

Manure is continuously removed from the lay house via the conveyor belt and deposited in compost rows within the manure drying area of the house.

The manure is dried via fans that reduce the moisture, thereby reducing ammonia emissions.
Each manure drying area is completely cleaned out at a minimum of every 7 days and a maximum of every 14 days.

The manure is removed from each house 5-6 days per week.
Each house is completely emptied every 14 days.

3. Identify below how you established the pattern or release and calculated release estimates.



Release data



Knowledge of Operating Procedures



Engineering estimate



Best Professional judgment

Other -

INSTRUCTIONS

SECTION II: SOURCE INFORMATION

(Part A)

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

General overview - When completing your written reports, you must take into consideration all sources of the release from your facility. For example, if the aggregate amount of a particular hazardous substance released within 24 hours from your facility equals or exceeds an RQ, then each source of the particular release must be identified, even if some release amounts from individual sources do not equal or exceed the RQ. The purpose of requiring information on the source(s) of the release is to provide EPA with sufficient information to evaluate the risk associated with the continuous release. Providing this information accurately in the initial written and first anniversary follow-up report will minimize future requests by EPA for additional information or clarification.

In this section of the written report, you should identify and describe separately each continuous release source. If the continuous release of the same hazardous substance comes from two or more sources (e.g., two stacks), then information should be reported separately for each of the sources. For example, if a stack is one of several sources of a hazardous substance release at your facility, you must provide information on that stack including: the stack height; the identity of the hazardous substance(s) being released from the stack; the quantity released; and the frequency of the release from the stack. If you have a release of a particular hazardous substance from three stacks, you should report each stack separately and provide the required information specified for each stack.

Although the continuous release reporting regulation allows multiple concurrent releases of the same CERCLA hazardous substance to be considered as if they were one continuous release, aggregate reporting of such releases from different sources complicates risk analyses. Area sources are most readily aggregated for purposes of continuous release reporting and risk evaluation when the frequency of the release from each source is the same. Similarly, aggregated stack releases are most readily evaluated if the frequency of the release from each stack is the same and the stack configurations (e.g., stack height, diameter, throughput) are the same. If you elect to aggregate releases across facilities, be certain to identify information about each source of the release from all of your facilities. Also, note that if you aggregate your releases, EPA may request clarifying information about the releases from each of the individual sources.

Identification of sources - In Section II, you must identify (i.e., name) and describe each continuous release source. There are several ways to name release sources. It is important to: (1) provide a name that clearly identifies the source (e.g., centrifugal processor A, rather than Unit A); and (2) avoid giving two or more sources the same name. It is also important to remember when naming your sources that EPA, at any time, may contact you with questions regarding releases from one of your named sources. It would be prudent, therefore, to name the sources at your facility in a manner that will be easy for you and other employees to identify them. For example, if your plant has four stacks, two wastepiles, and twenty-four valves, you may name the sources as follows: Stack #1; Stack #2; Stack #3; Stack #4; Wastepile #1; Wastepile #2; and Valves in Building #2. Note that the "Valves in Building #2" are aggregated in this example and reported as a single source.

Required information - Section II, Source Information, contains three Parts (A, B, and C). You must provide the information required in each of these Parts for each continuous release source. Be sure to place the name of the source on all pages associated with that specific source. There is one exception to this rule. If the release from any individual source will affect more than one environmental medium (e.g., a wastepile releasing to air and ground water) it must be modeled separately. Therefore, any source that affects two different media should be treated as two separate sources for purposes of reporting. This is desirable because EPA must analyze each release pathway separately to properly evaluate the risks posed by the continuous release. In addition, because the hazardous substance releases to each medium may differ in frequency and quantity, it is useful to distinguish the releases for purposes of risk evaluation.

Part A - Basis for Asserting the Release is Continuous and Stable in Quantity and Rate:

You must first identify the source of the release (include the name of the source in all subsequent parts), then briefly describe the basis for stating that the release is continuous and stable in quantity and rate. Your description of the basis for stating that the hazardous substance release is continuous and stable in quantity and rate should include whether the release is continuous without interruption, or is a routine, anticipated, intermittent release. It should also include information on when the release is expected to occur (i.e., evidence of predictability of the release). One example of a release that may be predictable and regular is fugitive emissions from valves that occur at different rates over the course of a production cycle as the pressure inside the system changes. Although the rate of such fugitive emissions may not be strictly uniform, it may be predictable in the sense that the rate and amount of the release vary in a similar manner each time the process is operated or decompression occurs.

Your description should also identify the activity that results in the release (e.g., batch process, operating procedure, loading/unloading, maintenance activity, filling of storage tanks). If the release occurs because of a malfunction, this should be explained fully. Note that only certain releases due to malfunctions can qualify as a continuous release. Please refer to the discussion in the preamble of the continuous release final rule at 55 FR 30171, Jul. 24, 1990.

Finally, your description should include information on how you established the pattern of the release and calculated release estimates (e.g., engineering estimates, your best professional judgment, past release data).

For each source identified, provide the following information:

- (1) Indicate whether the release is continuous without interruption or abatement or routine, anticipated, and intermittent.
- (2) Identify the activity or activities that cause the release from the source.
- (3) If the release results from a malfunction, describe the malfunction and explain why the release should be considered continuous and stable in quantity and rate.
- (4) Identify how you established the pattern of the release and calculated release estimates.

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SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 1173776

Name of Source:

Tonopah Barn Numbers 1-14 and Pullet House L
T1 = 9/14, T2 = 11/14, T3 = 01/15, T4 = 03/15, T5 = 05/15, T6 = 07/15, T7 = 09/15, T8 = 11/15,
T9 = 01/16, T10 = 03/16, T11 = 11/16, T12 = 01/17, T13 = 03/17, T14 = 05/17, PL = 07/16

Part B: Specific Information on the Source

For the source identified above, provide the following information. Please provide a SEPARATE sheet for EACH source.

AFFECTED MEDIUM. Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from this source. If your source releases hazardous substances to more than one medium (e.g., a wastepile releasing to air and ground water), treat the release to EACH medium as a separate source and complete Section II, Parts A, B, and C, of this format for EACH medium affected.

☒ **AIR** If the medium affected is air, please also specify whether the source is a **stack** or a ground-based **area source**.

☐ **Stack** Indicate stack height in feet or meters

☐ **Ground Based**

☐ **SURFACE WATER**

If the release affects any **surface water body**, give the name of the water body.

☐ **Surface Water Body**

N/A

☐ **Stream**

If the release affects a **stream**, give the stream order or average flow rate, in cubic feet per second.

Stream Order

N/A

OR

Average Flow Rate (cubic feet/second)

N/A

☐ **Lake**

Surface area of lake (in acres)

N/A

Average depth of lake (in meters)

N/A

If the release affects a **lake**, give the surface area of the lake in acres and the average depth in meters.

☐ **SOIL OR GROUND WATER**

If the release is on or under ground, the location of public water supply wells within two miles.

N/A All manure is contained in the manure drying area within the lay house

Optional Information

The following information is not required to comply with the regulation; however, such information will assist EPA in evaluating the risks associated with the continuous release. If this information is not provided, EPA will make conservative assumptions about the appropriate values. Please note that the units specified below are suggested units. You may use other units; however, be certain that the units are clearly identified.

For a stack release to air, provide the following information, if available:

Inside diameter (feet or meters)

N/A

Gas Exit Velocity (ft or meters/sec)

N/A

Gas Temp (degrees Fahrenheit, Kelvin, or Celsius)

N/A

For a release to surface water, provide the following information, if available:

Average velocity of surface water (feet/second)

N/A

INSTRUCTIONS

SECTION II: SOURCE INFORMATION

(Part B)

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

Part B - Specific Information on the Source:

You must identify the environmental medium (i.e., air, surface water, soil, or ground water) affected by the hazardous substance release from each source identified in Section II, Part A. In addition, you must provide specific information on the source and its affected environment. It is important to remember that if you have a release from a single source that affects two different media (e.g., gypsum stack releasing radon to air and radionuclides to ground water), you should treat the release to each medium as a separate source for purposes of reporting. Another important point to remember when completing all sections of the written report is to include the appropriate units, such as kilograms, meters, or curies.

Environmental medium - Identify the environmental medium (i.e., air, surface water, soil, or ground water) that is affected by the release from the identified source.

1. **Air** - If the medium affected is air, provide the following information:
 - a. Indicate whether the source is a stack or ground-based area source.
 - b. If the source is a stack, provide the stack height in feet or meters. The stack height is the distance from the ground to the top of the stack.
 - c. If the source is an area source (e.g., a waste pile, surface impoundment, landfill, valve, pump seal, or storage tank vent), provide an estimate of the surface area or area of the release source including the appropriate unit such as square feet, square meters, or acres.
2. **Surface Water** - If the medium affected is surface water, provide the following information:
 - a. If the release affects any surface water body, give the name of the water body.
 - b. If the release affects a stream, give the "stream order" or the average flow rate (in cubic feet per second). This information can be obtained from your state water resource division or USGS. If you cannot locate this information, use the chart below to estimate the flow rate according to the velocity of the stream. If the velocity of the stream fluctuates during the year, use the average velocity when calculating average flow rate.
 - c. If the release affects a lake, or other large surface water body (e.g., a bay) give the surface area of the lake (in acres) and the average depth (in feet or meters). Below are sources of information for estimating the average lake depth.
3. **Soil or Ground Water** - If the medium affected is soil or ground water, provide the following information:
 - a. If the release is on or under ground, indicate the distance to the closest public water supply well within a two-mile radius of the site. Information regarding the location of public water supply wells may be available through the county office that issues permits for wells.

Estimated Average Stream Flow Rates

Stream Order	Mean Flow (CFS)	Mean Velocity (feet/sec)
1	0.65	1.0
2	3.10	1.3
3	15.00	1.5
4	71.00	1.8
5	340.00	2.3
6	1,600.00	2.7
7	7,600.00	3.3
8	56,000.00	3.9
9	171,000.00	5.6
10	810,000.00	5.9

Sources of Information for Estimating Average Lake Depth

If the lake is large enough to be navigable, your local Coast Guard office will have a navigation chart that will provide the average depth of the lake. For smaller lakes, you may estimate the average depth of the lake by relying on your knowledge of the use of the lake and the surrounding area, and your best professional judgment.

Optional information - The following information is not required to comply with the regulation; however, such information will assist EPA in evaluating the risks associated with a continuous release. If the information below is not provided, conservative values will be used to evaluate the risks associated with the continuous release.

1. If the source is a stack release to air, provide the: (a) inside diameter of the stack; (b) gas exit velocity; and (c) gas temperature.
2. If the release affects surface water, provide the average velocity of the surface water.

EXAMPLES OF REPORTING SINGLE HAZARDOUS SUBSTANCES

In this example, your facility has a release which may qualify for reduced reporting as a continuous release. The hazardous substances released from the identified source (Stack A) are hydrogen chloride (7647010) and hydrogen flouride (7664393).

The volume of hydrogen chloride (HCl) released in 24-hour period is between 0 and 9,950 lbs. During the previoius year, 11,500 lbs of HCl was released. The release occurs once per week in February and June for a total of 8 days per year. The amount of hydrogen flouride (HFl) released is between 1 and 6,000 lbs. The release of HFl occurs approximately 120 days each year. A total amount released last year was 13,800 lbs.

For these releases from the specific source, you must provide the information outlined below.

<u>Name of Hazardous Substance</u>	<u>CASRN #</u>	<u>Normal Range</u> (in lbs., kg or Ci per day)		<u>Number of Days</u> <u>Release Occurs</u> (per year)	<u>Total Quantity</u> <u>Released in Previous Year</u> (in lbs., kg or Ci)	<u>Period of the</u> <u>Release</u>
		<u>Upper Bound</u>	<u>Lower Bound</u>			
Hydrogen Chloride (HCl)	7647010	9,950 lbs	0 lbs	8	11,500 lbs.	February; June
Hydrogen Flouride (HFl)	7664393	6,000 lbs	1 lb	120	13,800	All 12 months

EXAMPLE OF REPORTING A MIXTURE

In this example, if your facility wants to report the release of a mixture of hazardous substances, you must list each component of the mixture by hazardous substance and include its percentage by weight. For example, for the release of mixture Z, you must provide the following information about its components, ethylene oxide, acrolein, and 2,3,5-tri-chlorophenol:

			Normal Range of Components		OR	Normal Range of Mixture		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs., kg or Ci)	Period of the Release
Name of Mixture	Name of Hazardous Substance Components	CASRN #	Weight Percentage	Upper Bound	Lower Bound	Upper Bound	Lower Bound			
Z	(components listed below)					100 lbs	0 lbs	365	79,500 lbs	All 12 Months
Z	Ethylene oxide	75218	10%	10 lbs	0 lbs					
Z	Acrolein	107028	15%	15 lbs	0 lbs					
Z	2,3,5-tri-chlorophenol	933788	20%	20 lbs	0 lbs					

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SECTION II: SOURCE INFORMATION (continued)

CR-ERNS Number: 1173776

Part C: Identity and Quantity of Each Hazardous Substance or Mixture Released From Each Source

Please provide a SEPARATE sheet for EACH source.

Name of Source:

Tonopah Barn Numbers 1-14 and Pullet House L T1 = 9/14, T2 = 11/14, T3 = 01/15, T4 = 03/15, T5 = 05/15, T6 = 07/15, T7 = 09/15, T8 = 11/15, T9 = 01/16, T10 = 03/16, T11 = 11/16, T12 = 01/17, T13 = 03/17, T14 = 05/17, PL = 07/16

List each hazardous substance released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Hazardous Substance	CASRN #	Normal Range (in lbs., kg, or Ci per day)		Number of Days Release Occurs (per year)	Total Quantity Released in Previous Year (in lbs., kg, or Ci)	Period of the Release
		Upper Bound	Lower Bound			
Ammonia	7664-41-7	1,593 lbs / day	0 lbs / day	365	Unknown	All 12 months

List each mixture released from the source identified above and provide the following information. Include units where appropriate. Radionuclides in curies (Ci).

Name of Mixture	Name of Hazardous Substance Components	CASRN #	Weight Percentage	Normal Range of Components (in lbs., kg, or Ci per day)		OR	Normal Range of Mixture (in lbs., kg, or Ci per day)		Number of Days Release Occurs (per year)	Total Quantity of Mixture Released in Previous Year (in lbs., kg or Ci)	Period of the Release
				Upper Bound	Lower Bound		Upper Bound	Lower Bound			
N/A											

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SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number: 1173776

Calculation of the SSI Trigger

For EACH hazardous substance component of a mixture indicated in Section II, Part C, list the names of the releasing sources and their upper bounds. Please use a SEPARATE sheet for EACH hazardous substance.

Name of Hazardous Substance: Ammonia

To calculate the SSI trigger (i.e., the upper bound of the normal range of a release) for the hazardous substance identified above, aggregate the upper bounds of the normal range of the identified hazardous substance across all sources identified in Section II, Part C. If the hazardous substance is also a component of a mixture, be certain to include the upper bound of the component as calculated in Section II, Part C, in your calculation of the SSI trigger.

Name of Source(s)	Upper Bound of the Normal Range of the Release (specify lbs., kg., or Ci)
Tonopah Barn #s 1-14 & Pullet House L	1,593 lbs.

TOTAL - SSI trigger for this hazardous substance release*: 1,593 lbs.

** This method for calculating the SSI trigger for the hazardous substance assumes that all releases of the same hazardous substance or mixture occur simultaneously. To the extent that a hazardous substance is released from your facility from different sources and at different frequencies, you may adjust the SSI trigger as appropriate so that it more accurately reflects the frequency and quantity of the release. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility or vessel. The normal range of the release includes all releases previously reported or occurring over a 24-hour period during the previous year.*

INSTRUCTIONS

SECTION III: SUBSTANCE INFORMATION

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

After you provide the required information for all sources of continuous releases from your facility, you must aggregate information of a hazardous substance release from all sources to determine the SSI trigger (upper bound of the normal range) for each hazardous substance released at your facility.

The SSI trigger of a particular hazardous substance is calculated by aggregating the upper bounds of the hazardous substance released across all sources at a facility.

If you are aggregating CERCLA hazardous substance releases from separate, contiguous, or adjacent facilities and reporting them in a single report, aggregate the upper bound of the normal range of the hazardous substance released from all sources at the site to determine the SSI trigger. If you aggregate your releases across facilities, the SSI trigger must also be site-specific, not facility-specific. Aggregating releases across facilities at the same site may reduce your reporting burden; however, EPA will evaluate the risks associated with the releases as if the releases were from one facility.

To calculate the SSI trigger for each hazardous substance you should:

1. List each specific source name and enter the upper bound of the normal range of the release from that source. If the identified hazardous substance is a component of a mixture, enter the upper bound of the normal range for that component of the mixture (as determined in Section II, Part C).
2. Aggregate the upper bound quantities from each source of the release. Report these totals as the SSI trigger for the hazardous substance. The example that is provided below illustrates the calculation of the SSI trigger for a release of ammonia.

The above method for calculating the SSI trigger of a hazardous substance assumes that all releases of the same hazardous substance occur simultaneously (i.e., over the same 24-hour period). To the extent that the frequency of the release differs, you may adjust the SSI trigger so that it more accurately reflects the frequency and quantity of the hazardous substance released from all sources over a 24-hour period. The SSI trigger in the final analysis must reflect the upper bound of the normal range of the release, taking into consideration all sources of the release at the facility. The normal range of the release includes all continuous releases previously reported or occurring over a 24-hour period during the previous year.

Calculation of the SSI Trigger for a Hazardous Substance

Hazardous Substance	Source	Upper Bound
Ammonia	Tank Vents in Building #1	120 lbs.
	Valves in Building #5	115 lbs.
	Upper Bound for Ammonia	235 lbs.

For the purposes of this example, it is assumed that the only sources of the ammonia release at the facility are the Tank Vents in Building #1 and the Valves in Building #5.

Paperwork Reduction Act Notice

The public reporting and recordkeeping burden for this collection of information is estimated to average 10 hours per response. Send comments on the Agency's need for this information, the accuracy of the provided burden estimates, and any suggested methods for minimizing respondent burden, including through the use of automated collection techniques to the Director, Collection Strategies Division, U.S. Environmental Protection Agency (2822T), 1200 Pennsylvania Ave., NW, Washington, D.C. 20460. Include the OMB control number in any correspondence. **Do not send the completed form to this address.**

INSTRUCTIONS

SECTION II: SOURCE INFORMATION

(Part C)

CR-ERNS Number:

If you are reporting a release of a CERCLA hazardous substance(s), you will be assigned a CR-ERNS number when you make this initial telephone call to the NRC (1-800-424-8802). This CR-ERNS number will become the identifier for your facility. Your CR-ERNS number will never change; it is the number that identifies you in the CR-ERNS database.

Part C - Identity and Quantity of Each Hazardous Substance or Mixture Released:

For each source, you must report information about the identity and quantity of the hazardous substances released from the source. In particular, you must identify the normal range of each release and the total annual quantity released during the previous year from each source.

You are not necessarily required to monitor releases to determine the normal range of the release. You may establish the normal range by using engineering estimates of releases under various operating conditions, knowledge of the operating history of the facility, experience with operating processes, professional judgment, or any other method that has a sound technical basis. EPA will use the upper bound of the normal range to estimate the risks to human health and the environment posed by the hazardous substance release.

To provide the required information regarding the quantity of the hazardous substance released from each identified source, you should begin by determining whether the release is a single hazardous substance or a mixture of hazardous substances.

Normal Range

The normal range of a continuous release includes all releases of a hazardous substance (in pounds, kilograms, or curies) reported or occurring during any 24-hour period under normal operating conditions during the previous year. Only releases that are both continuous and stable in quantity and rate may be included in the normal range.

Reporting Single Hazardous Substances - For each source, follow the directions below to report each hazardous substance released from the source that is a single hazardous substance or a component of a mixture that you wish to report separately.

1. Identify the hazardous substance released by name and by Chemical Abstracts Service Registry Number (CASRN). The CASRN for a hazardous substance can be located in any material safety data sheet or in most chemical supplier company catalogues.
2. Provide the upper and lower bounds of the normal range of the release from the identified source (i.e., quantity in pounds, kilograms, or curies) during the previous year.
3. Estimate the total annual amount (in pounds, kilograms, or curies) of the hazardous substance released from the identified source during the previous year.
4. Specify the frequency of the release by indicating the number of days the release occurs per year from the identified source. Stating "continuous" is not sufficient, as one source may be continuously operating 365 days a year, while another source may be continuously operating on weekdays, 261 days a year.
5. Indicate the actual months the release occurs.

Reporting a Mixture - For each source, follow the directions below to report each mixture released from the source.

1. Identify the mixture by name (e.g., Blue Pigment #25).
2. Identify each hazardous substance component of the mixture by name and CASRN.
3. Estimate the percentage by weight of each hazardous substance component of the mixture.
4. Provide the upper and lower bounds (i.e., quantity in pounds, kilograms, or curies) of the normal range of each hazardous substance component of the mixture that was released from this source. To calculate the upper bound of the normal range of each hazardous substance component, multiply the weight percentage of each component by the upper bound quantity of the mixture.
5. Provide the upper and lower bounds (i.e., quantity in pounds, kilograms, or curies) of the normal range of the mixture that was released from the identified source during the previous year.
6. Specify the frequency of the release by indicating the number of days the release occurs per year from the identified source. Stating "continuous" is not sufficient, as one source may be continuously operating 365 days a year, while another source may be continuously operating on weekdays, 261 days a year.
7. Estimate the total annual quantity (in pounds, kilograms, or curies) of the mixture that was released from the identified source during the previous year.
8. Indicate the actual months the release occurs.